EXHIBIT "B" (1 of 2)

$\overline{}$	Case 7:07-cv-02866-CS-GAY Documen	t 23-20	Filed 05/07/2008 Page 2 of 28	
	<i>i</i>	1	3	_
	in the second of		1	
1			2 IT IS HEREBY STIPULATED AND AGREED,	
5	UNITED STATES DISTRICT		3 by and between the attorneys for the respective	
]	SQUTHERN DISTRICT OF NEW YORK			
. 4	SONNY A. SINKOV, as Father and	1	4 parties bereto, that the seeling and filing of	
5	Fotential Personal Representative of SPERCER SINKOV, deceased, and the	•	5 the within deposition be waived; that such	
	Satate of Spencer E. Sinkov, deceased,	'	6 deposition may be signed and sworn to before any	
. 7	Plaintiffs.	'	7 officer authorized to administer an eath with	
8	-8gainst-	1 1	B the same force and effect, as if signed and sworn	
9	DONALD a. SMITS, individually and in his official capacity as Sheriff of	,	to before a Justice of this Court.	
10	Putnam County, Doseph A. VASATHRE, Endividually, LOUIS G. LAPOLIA,	10		
21	individually, the COUNTY OF PUTNAM,	1		
12	lefendants.	i		
13	perendanta.	17	T IS FURTHER STIPULATED AND AGREED	
14	x	13) that all objections, except as to form, are	
. 15	227 Wiggningdalo Road	14	reserved to the time of trial.	
16	White Plains, New York Pangary 17, 2008	15	:	
17	10:15 a.m.	16	•	
18	CVARIANTED REPORT NO	17	IT IS FURTHER STIPULATED AND AGREED	
	SXAMINATION BEFORE PRIAL OF XEVIN OUTSY, a	, 1 18		
19 20	witness on behalf of the Defendant AMERICOR, INC.,	19	The state of the s	
	in the above-captioned metter, hald at the above	1	menter may be signed before out a perior	
57	time and place, before a wotary Public of the	20	The state of the s	
22	State of New York.	1 21	sworp to before this Court.	
13		22		
. 24		23	•	
25	Danna Gothafk, Sharthand Seporter	24		
	•	25		
	COMPU-YHAM SHORTHAMO REPORTING		COMPU-TRAIN SHORTHAND REPORTING	
1 .	2			
2 3	2 APPEARANCES:	,	6	_
1 2 2 3	_	1		
1 2 4 3	_	2	KEVIN DUFFY,	
1 2 3 3 4	APPEARANCES:	ĺ		
3 4 5	APPEARANCES: LOVETT & GOULD Altomeys for Plaintiff 222 Bloomingdale Road	2	KEVIN DUFFY,	
1 2 4 3 4 5 6	APPEARANCES: LOVETT & GOULD Attorneys for Plaintiff	2	A X E V I N D U F F Y, Baving been Culy sworn by Donna Bochask,	-
3 4 5	LOVETT & GOULD Attorneys for Plaintiff 222 Bloomingdale Road White Plains, New York 10601	3	A X E V I N D U F F Y, Baying been Culy sworn by Donna Bochnik, A Notary Public within and for the Stato	
3 4 5	LOVETT & GOULD Attorneys for Plaintiff 222 Bloomingdale Road White Plains, New York 10601	2 3 4 5	A KEVIN DUFFY, baying been Culy sworn by Donne Bochark, A Notary Public within and for the Stato of New York, was examined and testified	
3 4 5 6 7	LOVETT & GOULD Attorneys for Plaintiff 222 Blooming dale Road White Plains, New York 10601 BY: KIM BERG, ESQ. MIRANDA SOKOLOFF SAMBURSKY SLONE	2 3 4 5	A KEVIN DUFFY, baying been Culy sworn by Donne Bochark, A Notary Public within and for the Stato of New York, was examined and testified	
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ł		1		Kevin Dur.	ļ	_	7 1 Kevia Duffy
500	90 :45	2	perhaps	you remember something as we proceed -	±-a≥+		1 Kevin Duffy 2 Q. And in terms of its official name,
30:5	0:47	3		terrupt me at any point and certainly,	to:ogy		3 Is It known as AmeriCor Corporation, or something
-	io	4		ou leave, so that we can make sure we	0>024	. 4	4 else?
}	Į	5	have a c	orrect and accurate transcript prior to	00:02:4	, 5	5 A. AmeriCor, Inc.
gne	n:45	6	the conc	usion of the deposition today.	00 52 3	. 6	6 Q. Is AmeriCor, Inc. registered to do
cau	5:57	7		Do you understand all of that?	00:00:5	, 7	7 business anywhere?
1 20:2	0:57	8	Α.		60.02;5	, 8	8 A. It's a Delaware corporation.
000		9	Q,	, ina jaar	00,025	9	9 Q. Okay. Is it registered, though, to
ŪC;0			_	nal background.	20;20;0;	10	10 do business in any other furisdictions, including
j gg (5)			. A.	I have a bachelor of science degree	000000	11	11 New York?
CO-01				ng from the University of Pennsylvania,	02/02/07	12	12 A. I'm not sure what you mean by
00;01				ve a master's in business administration			
3 03:51				aster's in health administration from	cocsgs	14	and the state of t
00.01				University.	00.0211		the and the second second second
99:01		_	Q. recently?	Which degree did you receive most	00:00:19		p
00:61			A.	The MBA/MHA.	90:00:58		and the state of t
3391		19	Q.		09/03/20		
CD:01		-	Α.	And that was a combined degree? Yes.	00:00:22		The state of the s
03:97:			Q.	And when did you receive that?	c0002+		
800013			Α.	2003, I believe.	02,00025		you move decident registered
CO:01:		_	Q.	And are you currently employed?	\$6:00:27		The state of the following of receiving
20:07:		_	Α.	Yes.	c0 03-92		
00.012		-	Q.	In what capacity?	05:00:36 00:00:39		-
}				COMPU-TRAN SHORTHAND REPORTING	00;00;39	20	
1				. В	} -	• • • •	COMPU-TRAN SHORTHAND REPORTING
ļ		1		Kevin Duffy		1	8 1 Kevin Duffy
00:01:4	90	2	A.	I'm the president of AmeriCor.	00:03:40	2	
02:01:6	a a	3	Q.	What is AmeriCor?	05:03:51	3	
00;01;d	ō	4	Α.	It's a health-care company that	00,00,45	4	- ·
00:31:4	9	5 I	provides	services în small, county jalls.	CO 02:56	5	
00.07:9	a •	5	Q.	Do you focus the nature of that	00:00:57	6	6 A. No.
CO:01-50	в .			any furisdiction, state, county?	0003258	7	 Q. And it would be the Putnam County
03:02:0		_		n particular?	00.04:05	8	B Correctional Facility?
90:02:00		_	. A.	Generally, we look for New York,	90:34:05	9	A. Well, the contract is with the
\$ 00-02:07			_	ey, and Pennsylvania.	COT #01	O	The services are provided at
D3 02:10			Q.	Is it a corporation?	89 84:10 °	11	the state of the s
00:02:13 00:02:13			Α.	It is.	00:04:12		
00002:13			Q. A.	Are there any other officers?	90:04.22		
60:02:35			Q.	No.	00:04:23 1		The state traces bring, willington,
000219			urrently h	How many employees does AmeriCor] 00:5424 1 }		
95:02:20			A.	Approximately, 14.	C0:04:32 1		
40:02:27			Q.	And for how long has AmeriCor been	02:04:3S 1		
0202:30			i that busi		cc⊗sas 1		a conjugation
DE:02:32			A.	Since 2003.	C000439 1		-
60-02-14			Q.	Was it a newly formed corporation at	00:04:38 2		
	22	t)	nat time?	and the state of t	00:3439 Z 60:36:52 Z		to the state of th
00:92:17			A.	Yes.	0>04:54 2		and a services to any server devisations;
60:05-06	24		Q.	And it's spelled A-m-e-r-i-c-o-r?	00:04:55 2	_	
00:02:41	25		A.	Yes.	000545 2		year marcata assessment and
				OMPU-TRAN SHORTHAND REPORTING		-	COMPU-TRAN SHORTHAND REPORTING
	_						TANK A WANT DISCUSSION TOWARD MCLOUTING

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Γ	Case 7:07-cv-02866-CS-GAY Decume	nt,23-20	
ļ	1 Kevin Dub,		11 Kevin Duffy
c0.05.85	2 total?	60007:10	2 for AmeriCor?
00.05.05	3 A. No.	00007:54	3 A. Approximately, 14, 15 months.
1 -	Q. What are the positions of these 14	00:07:42	4 Q. Do you have any understanding as to
	5 employees?	00:07:544	5 his hours of work at the facility?
	A. They are registered nurses, and a	02:07:47	6 A. He was assigned to work 12 hours a
C0.05.14	7 clerk, and a mental-health worker.	C0:07;49	7 week,
1	Q. Physically, where do these 14	00:07:57	 Q. In addition to that, is he on call
0205:27	employees go to perform services for AmeriCor? A. At the Putnam County Correctional		9 atall?
eczsno 11	Its one i delient capitty confectional	0007-91 1 (the second and the second can, but
00.0536 12	:	00,0e;91 1 1	and the party of the the their Me 11660
90cce:32 13	when are one scale bouldtolicles or file	COCO364 72	_
00:05:22 14	A. She answers the phone, does filing,	30,000 13 30,000 74	at the field any ficalises, as fall as
00 000 38 15		cace of 15	_
GG:25:#1 16	Q. For how long has AmeriCor employed a	020822 16	·
		GG:28:12 17	
20.25,51 19		00/06/23 18	
co.ssa+ 19	The modes, or floars per week,	22:01:25 19	
BD 05.52 20	does the clark work?	cos027 20	· _
ociteiro 21	 A. It's a 20-hour-a-week position. 	02:03:20 21	
cox5.04 22	Q. How many of the 14 employees are	ce:00:14 22	_
00006:20 23	registered nurses?	00:08:35 23	
00::6:11 24	A. Everyone except the mental-health	0201:37 24	A. Forty,
00x3x18 25	worker and the clerk.	co:30:39 25	Q. Are each of the 14 employees actual
·	COMPU-TRAN SHORTHAND REPORTING	_	COMPU-TRAN SHORTHAND REPORTING
1	10 Kevin Duffy		12
tc-0620 2	Q. So, 12?	1	Kevin Duffy
00.0549 3	A. Approximately.	00:00:00 2	employees of the company? Are they considered to be independent contractors?
00:06:22 4	Q. And in terms of the hours for those	00:25:52 4	
00x62s 5	nurses, do they rotate shifts, or are they	200 MI 57 5	A. No; they're all employees. Q. How was it that AmeriCor came to
200929 6	assigned to set shifts?	00-50m 6	provide services for the County of Putnam in or
anong) 7	 There are several that work pretty 	100.00.01 7	about 2003?
000252 8	much assigned shifts, but they are the	scoses B	A. The county issued a request for
66.02an 9	positions are such that they can work any of	00жэдт 9	proposals, and the company responded.
000661 10	them.	cc:29:10 10	Q. How did you find out about the
20:00:44 11	Q. What are the shifts that the	03:09:72 11	request for proposals?
20::nys 72	AmeriCor employees work? Do they mirror the	02.0017 12	A. I don't recall specifically.
20 00 45 13 CO:05:54 14	shifts of the correction officers, or are they different?	ca:sa:sa 13	Q. Prior to coming to learn about the
00.ceas 15	A. I don't know that they mirror the	00:0921 14	request for a proposal, did you have any contact
90.0855 16	correctional officers, but the shifts generally	20:09:24 15	with anybody in the county or in the facility?
co.de.sa 17	run from 7:30 to 4:00, 3:30 to midnight, and	00:3021 16 02:02:35 17	A. Not that I recall.
03.0749 18	11:30 to 8:00.	90:09.37 18	Q. When you received the request for a
60:07.12 19	Q. And who's the mental health-care	оссено 19	proposal, did you reach out to anyone? A. Reach out?
00.0720 20	professional?	000390 15	Q. Yes; speak to anyone.
00:07:20 21	A. By name?	20:09:44 21	A. There was a bidders' conference that
1 22	Q. Yes.	ордэмт 22	I attended.
020729 23	A. Currently, it's Eugene McQuillen,	0209.51 23	Q. Where was that held?
00:07:23 24		50:09:52 24	A. At the facility.
Diagr:26 25		opcess 25	Q. Were other bidders present?
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING

		Case 7	7:07-cv-02866-CS-G AY Docume	nt 23-	20	Filed	05/07/2008 Page 5 of 28
İ			-	į		:	. 15
j	1	_	Kevin Duf _{i, .}	.	1		Kevin Duffy
ŋ ɔ q₽ Sʁ	2	Α.	Yes.	C0:11:5	, 2		ontract was subsequently renewed after
90:00:53	3	Q.	Do you recall how many?	00:120	1 3	the first s	six months or one year?
3	4	Α.	No.	00:12:00	. 4	A.	
ه. إ	5	Q.	Prior to attending the bidders'	90:12:03	5	Q.	Do you recall when that was?
C0:10;10	† -		e, did you have any conversations with	CD:82:09	6	Α.	•
00:10.72			from the county or the Sheriff's	00:12:07	7	Q.	
35:15:16 	8	Departme		06:12:12	8	_	o an agreement?
CO-10:18	9	Α.	Not that I recall.	G0:5Z:14		A.	Yes.
00:20:47		Q.	AmeriCor submitted a proposal?	00:1214		Q.	,
		Α.	I'm sorry?	02:12:17			with respect to the contract, other than
00:10:35 1		Q. A.	Did AmeriCor submit a proposal Yes.	90:12:20			for services?
22:16:34 1		Q.		00:52:22		Α.	
90/10/35 1		Α.	in response to the RFP? Yes.	0tx12229			ie one I recall was for mental-health
00.1036		Q.		901ಫನ್ನಾ		services.	
00:10:20 1			And did there come a point in time were notified that the county selected	60:12:23		Q.	Do you recall which contract that
02:24: 1			to provide services for the facility?	00.t234		_	ent took place in?
x120 1		A	Yes.	03.12.37		A.	Not specifically. It was a couple
CE:1590 2		Q.	Do you recall who notified you of	90:12:30	•	of years .	_
09:10:44 2		that?	bo you recall who hodned you di	30:52:40		Q.	And what did it provide in terms of
021245 2		Α.	No.	00:H2542 09:H243			what was existing and what you were now
contents 2		Q.	And at that point in time, did you	09:12:45 PQ:12:45		entering in A.	
оолона 2			a contract?	\$0:52:48		_	Up until that point, AmeriCor had responsible for mental-health services.
021253 2		A.	Yes.	40:1251			amendment, we provided a psychiatrist,
			COMPU-TRAN SHORTHAND REPORTING	¥0.1201			COMPU-TRAN SHORTHAND REPORTING
,			14	+-			· · · · · · · · · · · · · · · · · · ·
į .	1				1		16
95:16:50	1	Q.	14 Kevin Dufiy	02.12-98	1 2		16 Kevis Duffy
Ι.	2	Q. began?	. 14		1 2 3	a mentai-	18 <i>Kevin Duffy</i> -health worker, and we provided the
90:16:50	2	•	14 Kevin Dufiy			a mental- psychotro	16 Kevin Duffy -health worker, and we provided the opic medications.
00:10:50 2 00:10:52 3 00:29-53 4	2 3 4	began?	14 Kevin Duffy Do you remember when the contract	DO:10:82		a mental- psychotro	18 <i>Kevin Duffy</i> -health worker, and we provided the
00:10:50 00:10:52 00:79-53	2 3 4 5	began? A.	14 Kevin Duffy Do you remember when the contract	00:10:82 00:13:94	4	a mental- psychotro Q.	16 Kevin Duffy -health worker, and we provided the opic medications. And does that remain true to today?
00:10:50 00:10:52 00:70:53 4	2 3 4 5 6	began? A. recall. Q. A.	14 Kevin Duffy Do you remember when the contract It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The	00:13:62 00:13:56 00:52:07	4 5	a mental- psychotro Q. A,	16 Kevis Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then,
00:10:50	2 3 4 5 6	began? A. recall. Q. A. contract h	14 Kevin Duffy Do you remember when the contract It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The last five or six signatures on it.	00:13:82 00:13:94 00:52:07 00:13:07	4 5	a mentai- psychotro Q. A, Q.	16 Kevis Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then,
00:10:50	2 3 4 5 6 7 8	began? A. recall. Q. A. contract h	14 Kevin Duffy Do you remember when the contract It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The	00:13:04 00:52:07 00:13:07 00:13:07	4 5 6 7	a mental- psychotro Q. A. Q. currently o	Kevin Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then, on staff?
00:10:00	2 3 4 5 6 7 8	began? A. recall. Q. A. contract h Q. A.	It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The las five or six signatures on it. On behalf of AmeriCor, did you sign? Yes.	00:13:04 00:13:04 00:52:07 00:13:07 00:13:10 00:15:12	4 5 6 7 8 9	a mentai- psychotro Q. A, Q. currently o	Kevin Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then, on staff? Yes.
00:10:00 2 00:10:00 00:10:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:10:10:10:10:10:10:10:10:10:10:10:1	2 3 4 5 6 7 7 8	began? A. recall. Q. A. contract h Q. A. Q.	It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The last five or six signatures on it. On behalf of AmeriCor, did you sign? Yes. Do you recall who signed on behalf	00:10:02 00:10:07 00:2:07 00:10:07 00:10:10 00:10:12	4 5 6 7 8 9	a mentai- psychotro Q. A. Q. currently o A. Q.	Kevis Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then, on staff? Yes. Who is that?
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00:10:00 2 00:10:00 2 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:00 00:10:10 00:10:10 00:10:10 10:10:10:10 10:10:10:10:10:10:10:10:10:10:10:10:10:1	2 3 3 4 5 6 6 7 7 8 9 9	began? A. recall. Q. A. contract h Q. A. Q. of the coun	It was effective July 1, 2003, as I And who signed off on the contract? I don't recall specifically. The lastive or six signatures on it. On behalf of AmeriCor, did you sign? Yes. Do you recall who signed on behalf ty? No.	00:10:02 00:13:04 00:52:07 00:13:07 00:13:12 00:13:12 00:13:13	4 5 6 7 8 9 10 11	a mental- psychotro Q. A. Q. currently o A. Q. A. Q.	Kevin Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then, an staff? Yes. Who is that? Dr. Asif, A-s-i-f. Is he an employee of AmeriCor?
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00:10:00	2 3 4 4 5 6 6 7 7 8 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	began? A. recall. Q. A. contract h Q. A. Q. of the coun A. Q. himself, sig A. Q. f any? A. contract w Q. services to l facility since A. Q.	No. Do you recall if the sheriff, ned? No. What was the term of the contract, I'm not sure whether the first ras for six months or a year. Has AmeriCor continuously provided the Putnam County Correctional is contract, Mo you recall of the sheriff, ned?	00:10:02 00:13:06 00:12:07 00:13:07 00:13:07 00:13:07 00:13:13 00:13:13 00:13:27 00:13:27 00:13:28 00:13:28 00:13:48 00:13:48 00:13:48 00:13:48 00:13:48 00:13:48 00:13:48	4 5 6 7 8 9 10 11 2 13 4 15 16 17 18 9 20 1 2 3 4	a mental- psychotro Q. A, Q. currently o A. Q. A. Q. place of bu A. top of my Q. been any o subcontract providing m Putnam Con A. Q. A. Q.	Kevin Duffy -health worker, and we provided the opic medications. And does that remain true to today? Yes. And is there a psychiatrist, then, an staff? Yes. Who is that? Dr. Asif, A-s-i-f. Is he an employee of AmeriCor? He's a subcontractor. Do you know where his principal siness is? I don't recall specifically off the head, no. Other than Dr. Asif, have there ever ther psychiatrists that AmeriCor has ted with, or actually employed, for mental-health services at the unty Correctional Facility? Not that I recall. Do you know Dr. Asif's first name?

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1	Kevin Duffy	.	19
90:11:59 2	the state of the s	1 2	
95:14:59 %		GD:25:19 Z	
56 4	and he responded.	00:16:21 3	
5		00:16:24 4	
1	A. I don't recall specifically.	G0:1626 5	
00:14:12 0	Q. When you say "we were recruiting,"	00 01 5.25 6	 Q. Does the clerk report to anyone? A. The health-services administrator.
021415 8	who do you mean? .	03:16:30 /	
9>14:16 9	A. AmeriCor.	00:16:3Z 8	-
39:14:18 10	Q. Other than yourself, did anybody	90:5637 9	
00;1425 11	partake in the recruiting activities?	00:007 10	
co::+24 12	A. I'm sure that the health-services	02:18:12 11	• • • • • • • • • • • • • • • • • • • •
101+21 13		02:16:47 12 00:16:48 13	care professionals on staff? A. Yes.
0214;35 14	involved.	00:10:10 13 10:16:18 14	
20014034 15	Q. And who was that?	anses 15	
50:14:34 1 6	A. Probably Richard DiMattio. Capital		_
00:439 17	D-i, capital M-a-t-t-i-o.	0015.57 16	.,
00:443 18	Q. Who currently, if anyone, is the	02:16:50 17	_
0214:45 19	health-services administrator?	20:16:59 18	
2010:45 20	A. The current health-services	\$ 00:1701 19	
00:450 21	administrator is Marlene McKenna, M-c-K-e-n-n-a.	02:17:13 21	for short periods. I don't remember all of their
cn:14.55 22	Q. And for how long has she held that	00:17:19 22	names.
no 14-57 23	position?	00:17:19 2.2 00:17:48 23	Q. Does AmeriCor employ any physicians?
00;14:57 24	A. She was just recently promoted this	co:17:18 23	A. I'm sorry?
00/14/5/ 24	month, as a matter of fact. Well, the end of	1	Q. Does AmeriCor employ any physicians?
De-15/00 2.0	COMPU-TRAN SHORTHAND REPORTING	00->>-22 25	A. We have a physician as a
1 '			
			COMPU-TRAN SHORTHAND REPORTING
·	18	4	. 20
1	18 Kevin Duffy	1	20 Kevin Duffy
02:15:12 2	Kevin Duffy December.	60:17:24 2	Z0 Kevin Duffy subcontractor, yes.
00:15:02 2	Kevin Duffy December. Q. And prior to that, was it	60:37:24 2 00:57:24 3	Z0 Kevin Duffy subcontractor, yes. Q. And who is that?
05:15:12 2 00:15:00 3 00:15:00 4	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio?	00:37:24 2 00:27:24 3 00:10:25 4	20 Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank.
02:15:12	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes.	00:37:24 2 00:37:24 3 00:16:25 4 20:16:32 5	Z0 Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t.
02/15/12 2 00/15/00 3 00/15/00 4 00/15/09 5 00/15/05 6	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio? A. Yes. Q. And with respect to the 14 employees	00:17:24 2 00:17:24 3 00:17:25 4 00:17:25 5 00:17:41 6	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat
02/15/12 2 00/15/00 3 00/15/00 4 00/15/00 5 00/15/05 6 00/15/12 7	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health-	00:37:24 2 00:37:24 3 00:10:25 4 00:17:25 5 00:37:47 6 00:37:47 7	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor?
02:15:12 2 00:15:00 3 00:15:00 4 00:15:09 5 00:15:05 6 00:15:12 7 00:15:15 8	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group?	00:17:24 2 00:17:24 3 00:17:23 4 20:17:22 5 00:17:47 7 00:17:49 8	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003.
02/15/12 2 00/15/00 4 00/15/00 5 00/15/00 6 00/15/12 7 00/15/15 8 00/15/15 9	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes.	00:17:24 2 00:17:24 3 00:17:23 4 00:17:25 5 00:17:47 7 00:17:49 8 00:17:52 9	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any
02/15/02 2 00/15/00 4 00/15/00 5 00/15/05 6 00/15/02 7 00/15/02 8 00/15/03 8 00/15/03 9 00/15/03 10	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator	00:17:24 2 00:17:24 3 00:17:25 4 00:17:25 5 00:17:47 7 00:17:49 8 00:17:52 9 00:17:58 10	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that?
02/15/12 2 00/15/00 4 00/15/00 5 00/15/00 5 00/15/00 6 00/15/12 7 00/15/12 8 00/15/13 8 00/15/13 10 00/15/13 10	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse?	00:17:24 2 00:17:24 3 00:17:25 4 00:17:25 5 00:17:47 7 00:17:49 8 00:17:52 9 00:17:52 10 00:17:57 11	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No.
02/15/02 2 00/15/00 4 00/15/00 5 00/15/00 6 00/15/00 6 00/15/00 8 00/15/15 8 00/15/15 8 00/15/15 10 00/15/15 10 00/15/15 11	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes.	00:17:24 2 00:17:24 3 00:17:22 5 00:17:27 7 00:17:29 8 00:17:29 9 00:17:57 11 00:17:57 12	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's
02/15/12 2 00/15/00 4 00/15/00 5 00/15/00 6 00/15/12 7 00/15/15 8 00/15/15 8 00/15/15 10 00/15/15 10 00/15/25 11 00/15/25 12 03/15/25 13	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes. Q. What are the responsibilities of the	00:17:24 2 00:17:24 3 00:17:24 4 00:17:25 5 00:17:47 7 00:17:49 8 00:17:59 10 00:17:59 11 00:17:57 11 00:17:57 12	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's responsibilities?
02/15/02 2 00/15/00 4 00/15/09 5 00/15/09 5 00/15/09 6 00/15/12 7 00/15/15 8 00/15/15 9 00/15/15 10 00/15/15 11 00/15/22 12 00/15/22 13 00/15/25 14	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattio? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes. Q. What are the responsibilities of the health-services administrator at the Putnam	00:17:24 2 00:17:24 3 00:17:24 4 20:17:32 5 00:17:47 7 00:17:49 8 00:17:52 9 00:17:52 11 00:17:57 12 00:18:21 13 00:18:22 14	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's responsibilities? A. He sees patients, reviews documents,
02/15/02 2 00/15/00 4 00/15/00 5 00/15/00 5 00/15/00 6 00/15/12 7 00/15/15 8 00/15/15 9 00/15/15 10 00/15/15 11 00/15/25 12 00/15/25 13 00/15/25 14	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes. Q. What are the responsibilities of the health-services administrator at the Putnam County Correctional Facility?	00:17:24 2 00:17:24 3 00:17:25 5 00:17:27 7 00:17:29 8 00:17:29 9 00:17:27 11 00:17:27 12 00:18:21 13 00:18:21 14 00:18:22 15	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's responsibilities? A. He sees patients, reviews documents, orders medications. General medical duties.
02/15/12 2 00/15/00 4 00/15/00 5 00/15/00 6 00/15/12 7 00/15/15 8 00/15/15 10 00/15/15 10 00/15/15 11 00/15/15 12 00/15/15 14 00/15/15 15	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes. Q. What are the responsibilities of the health-services administrator at the Putnam County Correctiona! Facility? A. The administrator works as the	00:1724 2 00:1724 3 00:1725 4 00:1725 5 00:1747 7 00:1749 8 00:1752 9 00:1752 10 00:1757 11 00:1757 12 00:1821 13 00:1821 14 00:1823 15 00:1823 16	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's responsibilities? A. He sees patients, reviews documents, orders medications. General medical duties. Q. Do you have any regular interactions
02/15/12 2 00/15/00 4 00/15/00 5 00/15/00 5 00/15/00 6 00/15/12 10 00/15/15 12 12 00/15/15 14 50/15/15 15 00/15/15 16 00/15/15 16	Kevin Duffy December. Q. And prior to that, was it Mr. DiMattin? A. Yes. Q. And with respect to the 14 employees that you talked about earlier, was the health- services administrator included in that group? A. Yes. Q. So, the health-services administrator is also a registered nurse? A. Yes. Q. What are the responsibilities of the health-services administrator at the Putnam County Correctional Facility? A. The administrator works as the primarily, as the day shift R.N. and is also	00:17:24 2 00:17:24 3 00:17:25 5 00:17:27 7 00:17:29 8 00:17:29 9 00:17:29 11 00:17:27 12 00:18:21 13 00:18:21 14 00:18:23 15 00:18:23 16 00:18:33 16	Kevin Duffy subcontractor, yes. Q. And who is that? A. I'm sorry; I'm drawing a blank. Dr. Michael Nesheiwat, N-e-s-h-e-i-w-a-t. Q. And for how long has Dr. Nesheiwat been a subcontractor of AmeriCor? A. Since July of 2003. Q. Did you know Dr. Nesheiwat at any time prior to that? A. No. Q. What are Dr. Nesheiwat's responsibilities? A. He sees patients, reviews documents, orders medications. General medical duties. Q. Do you have any regular interactions with him?
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- (1		Kevin Duff,	21			:	er en en	23	
00	L19004	_	either sv	ystem-based or patient-based. F	lor.		1		Kevin D	uny	
	:19:07	3		, when the facility was accredite		G0.21 \$1	_	A. Q.	None.		
	7-10	4		Commission, there were discuss		05:27:51	-	7-		services administrator	
	4	5	him on t		SIGNED WATER	20,21,57		A.	person at the fac	IIITY?	
	:13:15	6	Q.		ano.	QQ.21.55		Q.	Yes,		
00:	:19:20	7	Ā.		, , , , ,	03:24:30	_	·	po you nave a nealth-services ad	ny regular communication	15
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DD:	19:42	12		t, Chicago-based agency that put		03:22:14		Q.		o ver almost anything. you communicate?	
- } oc:	12:48	13		andards that governs pretty muc		00:22:18		. A.		can be daily to	
l aa:	19:52	14		of the health-care services provide		602220		weekly.	re satisti II	cau bé datik to	
00:1	12:56	15		onal facilities. And a facility that		0022:22		Q.	Is the booth, a	ervices administrator	
002	7¢-23	16		ose standards, then is accredited	<u>.</u>	0>27.26				any periodic basis?	ĺ
cu2	20:20	17	Q.		"	002222		A.	No.	any penous, pasis?	
00.2	2913	18	facility has	ve that is accredited by that	ĺ	CO 22.54		Q.		rovide you with any	
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002	0:20	21	meets na	tional standards.		00:2244		Α.		Inistrator would]
00:2	9:25	22	Q.	In terms of Dr. Nesheiwat, do you	ı İ	00.2246	22		he monthly stat		·
902	oac j	23	know how	often he physically goes to the		00/22/52		Q.	What's contains		
Ç0:2	0:42	24	Putnam Co	ounty Correctional Facility?	į	C0:22:54	24	Ā.		many inmates are in th	
002	145 Z	25	A.	Once or twice a week.	;	00.2256				ere seen by the nurses :	
				COMPU-TRAN SHORTHAND REPO	RTING					HORTHAND REPORTING	
7	_										
, ,					22			•		24	
, 		1		Kevin Duffy			1		Kevin Du	. 24	
002:	247	1	Q.	Kevin Duffy Do you know for how many hours	22	03-23:00	•	.,,	Kevin Du	. 24	·
90:20		1 2 3	Q. total?	-	22 in	03-23:00 08:23:65	•	the doctor	Kevin Du rs. How many p	24	·
1	:49	2	_	Do you know for how many hours It varies.	22 in		2	the doctor	Kevin Du rs. How many p gency room. Th	24 ffy people were sent out to	·
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	i Kevin Duf.	ļ	1 Kevin Duffy
00024.22	2 A. Yes.		2 or did somebody else?
60:24:22	3 Q. What is their role?		3 A. I'm sorry; the question, again?
13 4	A. They see or review cases of inmates	00:25%5	4 Q. The original policy manual, before
1 . 5	5 that are brought into the facility.	09:26:43	5 any amendments or revisions were made, did you
e0:24:32 6	Q. You said, "see or review." Is it	au:25:51 (6 draft that?
00:24:25 7	7 one or both?	C02551	7 A. Yes.
20.24:37	A. It can be one or the other, or both.	0022031 (Q. Did anybody assist you?
co.2=:30 S	are and any requirements in terms	90:20:54 S	A. It would have gone through the
00:24:42 10	brocesses & second for all	c02763 10	health-services administrator for suggestions,
20:24.48 11	the state of the s	0027:07 11	corrections, editing. That kind of stuff.
cc:24:49 12	an incoming phytice.	02/27:10 12	Q. Who was that at the time?
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002525 23	the state of a poster matter.	0027:48 22	· · · · · · · · · · · · · · · · · · ·
30:25:30 24	is it specific to the Putnam County Correctional	90:27:53 23	
c0:26:34 25	Facility?	002755 24 002755 25	
	COMPU-TRAN SHORTHAND REPORTING	000795 23	want to confer? COMPU-TRAN SHORTHAND REPORTING
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1	26 Kevin Duffy	1	28
1 002934 2		1 0027:55 2	28 Kevin Duffy
	Kevin Duffy		28 Kevin Duffy MR. COON: <i>(Addressing the</i>
G0(25)34 2	Kevin Duffy A. Yes.	00:27:55 2	28 Kevin Duffy
509994 2	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I	00:27:55 2 00:27:57 3	28 Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for
505594 2 502594 3 002532 4	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals.	00:27:55 2 00:27:57 3 00:27:48 4	28 Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second.
002524 3 002524 4 002524 5	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and	002756 2 022757 3 022758 4 002148 5	Z8 Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken)
002524 2 002524 3 002524 4 002524 5	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary.	0027:55 2 0027:57 3 02:27:58 4 00:21:55 5 00:31:56 6	Z8 Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG:
002534 2 99.2534 3 002532 4 002534 5 002538 6 002535 7 002535 8	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have	00:27:56 2 00:27:57 3 00:27:58 4 00:21:58 5 00:31:56 6 00:32:18 7	Z8 Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right.
00254 2 99.254 3 00254 4 00254 5 00254 6 00255 7 00255 7 00255 3 00255 3	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy	0027:55 2 0227:37 3 02:27:48 4 00:27:48 5 00:31:56 6 00:32:18 7 00:32:75 8	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for
002534 2 002534 3 002532 4 002538 6 002538 6 002535 7 002555 8 002555 9 002551 10	A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual?	002755 2 002757 3 002749 4 002140 5 003216 7 003217 9 003217 9 003210 10 003210 11	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for you, though.
002544 2 002544 3 002542 4 002548 6 002548 6 002555 7 002555 3 002555 9 002561 10 002803 11 002933 12	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual? A. Yes.	002755 2 022737 3 022748 4 002148 5 003156 6 003235 8 003237 9 023277 9 023271 10 003249 11	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for you, though. THE WITNESS: Okay.
00,25,24 2 00,25,24 4 00,25,24 5 00,25,26 6 00,25,25 7 00,25,25 8 00,25,27 9 00,25,27 9 00,25,27 10 00,25,27 11 00,25,27 11 00,25,27 12	Kevin Duffy A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual? A. Yes. Q. Do you recall anything about the	002755 2 002757 3 002758 4 002758 5 003159 6 003275 8 003277 9 003277 9 003277 10 003277 11	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for you, though. THE WITNESS: Okay. (Whereupon, the following portion of
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60,25,14 2 99,25,24 3 00,25,32 4 00,25,33 6 00,25,33 8 00,25,33 9 00,25,33 11 00,25,33 12 00,25,33 13 00,25,37 14 00,25,33 16 09,25,34 17 00,25,34 18 00,25,37 19 00,25,34 20 00,25,34 21 00,25,34 20	A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual? A. Yes. Q. Do you recall anything about the nature of those revisions? A. No. Q. Who made the revisions? A. I do. Q. Do you recall anything that prompted you to make the revisions? A. Well, generally, they're reviewed once a year, per the standards, National Commission standards, and then on an as-needed basis if something changes within the facility.	0027:55 2 0027:57 3 00:27:48 4 00:31:48 5 00:31:48 6 00:32:48 7 00:32:47 9 00:32:47 11 00:32:21 12 00:32:22 13 00:32:22 14 16:32:22 15 00:32:22 16 00:32:22 17 00:32:22 17 00:32:32 19 00:32:32 19 00:32:32 20 00:32:4 23	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for yeu, though. THE WITNESS: Okay. (Whereupon, the following portion of the record was read back by the reporter: Q. Do you recall the clrcumstances of her leaving? A. Yes. Q. What were they.) A. There were disagreements over conditions of employment, and she left. Q. Do you recall the nature of those disagreements? A. That's all I'm allowed to say on the
002534 2 002534 3 002534 4 002534 5 002538 6 002535 8 002535 7 002535 10 002531 11 002635 12 002531 15 002531 16 002531 16 002531 17 002531 18 002531 19 002531 19 002532 21 3 22	A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual? A. Yes. Q. Do you recall anything about the nature of those revisions? A. No. Q. Who made the revisions? A. I do. Q. Do you recall anything that prompted you to make the revisions? A. Well, generally, they're reviewed once a year, per the standards, National Commission standards, and then on an as-needed basis if something changes within the facility. Q. In terms of the single policy manual,	002755 2 002757 3 002758 4 003156 6 003218 7 00325 8 003217 9 00325 10 003221 12 003221 12 003222 15 003222 15 003222 15 003222 17 003232 17 003232 17 003232 17 003232 17 003232 17 003232 17 003232 17 003232 17 003232 17	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for you, though. THE WITNESS: Okay. (Whereupon, the following portion of the record was read back by the reporter: Q. Do you recall the circumstances of her leaving? A. Yes. Q. What were they.) A. There were disagreements over conditions of employment, and she left. Q. Do you recall the nature of those disagreements? A. That's all I'm allowed to say on the matter.
002534 2 99254 3 002532 4 002538 6 002538 6 002539 7 002539 10 002531 10 002531 11 002531 12 002531 14 002531 15 002531 16 002531 17 002531 18 002531 18 002531 20 002532 21 1222 002533 23 002533 23	A. Yes. Q. And since AmeriCor has come into the facility in July of 2003, has there been more than one policy manual issued? And by that I mean, versions of policy manuals. A. There is a single policy manual, and it is reviewed and revised as necessary. Q. Do you recall if any revisions have been made since July of 2003 to that policy manual? A. Yes. Q. Do you recall anything about the nature of those revisions? A. No. Q. Who made the revisions? A. I do. Q. Do you recall anything that prompted you to make the revisions? A. Well, generally, they're reviewed once a year, per the standards, National Commission standards, and then on an as-needed basis if something changes within the facility.	0027:55 2 0027:57 3 00:27:48 4 00:31:48 5 00:31:48 6 00:32:48 7 00:32:47 9 00:32:47 11 00:32:21 12 00:32:22 13 00:32:22 14 16:32:22 15 00:32:22 16 00:32:22 17 00:32:22 17 00:32:32 19 00:32:32 19 00:32:32 20 00:32:4 23	Kevin Duffy MR. COON: (Addressing the witness:) Let's just step out for a second. (Recess taken) CONTINUED EXAMINATION BY MS. BERG: THE WITNESS: All right. Could you restate the question for me? MS. BERG: I can't. She can read it back for yeu, though. THE WITNESS: Okay. (Whereupon, the following portion of the record was read back by the reporter: Q. Do you recall the clrcumstances of her leaving? A. Yes. Q. What were they.) A. There were disagreements over conditions of employment, and she left. Q. Do you recall the nature of those disagreements? A. That's all I'm allowed to say on the

L	Case 7:07-cv-02866-CS-GAY Documer	nt 23-20	Filed 05/07/2008 Page 9 of 28
-	1 Kevin Du; 29		31
cc:32.4a	2 instruct him not to answer?		1 Kevin Duffy
0075%2	3 MR. COON: Yes.		2 Q. Did you ever come to learn of any
ی ا	4 Q. Were the disagreements with Murnane	00:34:36 00:34:36	 prior suicides at the facility? Meaning, prior to AmeriCor coming in.
	5 or others?		5 A. No.
00.50550	6 A. With Murnane.		
G0:22:54	7 Q. And yourself?	00:34.97	The second state of the second
20:32.58	8 A. Yes.	00:54:50 B	
CG:32.57	9 Q. Has AmerlCor, other than in this	002454	
003262 1		00:34:57 10	
் வை வி	1 A. No	ca:34±9 1 1	
00/25/66 1)	 Q. Since AmeriCor came into the Putnam 	00:35.01 12	
00.33.13 13	3 County Correctional Pacility, do you know how	00:30:04 13	
00:33:14 14	many suicides have occurred in that facility?	00:25:29 14	
00:30:17 13		on:09:15 15	
022247 1 1	The two accountings,	oc;25:19 16	
90,30:20 17	The same and accompany will account	009521 17	
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90,32,76 15		ca:2520 19	
cc:502a 20		00:35.32 20	 I'm sure there must have been some.
09:3329 21	are you ever bearing to learn or any	90:36:36 21	I don't recall specifically, off the top of my
20,32:31 22		002535 22	head, no.
00:33:27 23	110.00.14 1117.010.	920507 23	 Q. Are you aware of whether the County,
00.33:40 24	Z III Seri 17/ 4 dien Cit	consne 24	itself, has any standards or regulations
00:33:45 25	and the country of the country of	000000 25	pertaining to the facility?
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1 1	Kovin Duffy		32
1 222343 2	Kevin Duffy	1	32 Kevin Duffy
1 220243 2	*-	coussit 2	32 Kevin Duffy A. It has its own operating procedures.
amages 2	Kevin Duffy point in time when Norberto Rivera committed	00:25:30 3	32 Kevin Duffy A. It has its own operating procedures, Q. Did you ever review those?
02:02:43 2 00:52:40 3	Kevin Duffy point in time when Norberto Rivera committed suicide? A. Yes.	00:25:97 2 00:25:99 3 00:25:59 4	32 Kevin Duffy A. It has its own operating procedures, Q. Did you ever review those? A. I think we may have reviewed some
00:23:40 4	Kevin Duffy point in time when Norberto Rivera committed suicide? A. Yes. Q. AmeriCor was providing services at	00:25:4 2 00:25:50 3 00:25:50 4 00:26:52 5	32 Kevin Duffy A. It has its own operating procedures. Q. Did you ever review those? A. I think we may have reviewed some that would have had an influence on medical
00:33:40 4 00:33:40 5	Kevin Duffy point in time when Norberto Rivera committed suicide? A. Yes. Q. AmeriCor was providing services at that point in time; correct?	0025997 2 002559 3 002559 4 002569 5 0025007 6	Xevin Duffy A. It has its own operating procedures. Q. Did you ever review those? A. I think we may have reviewed some that would have had an influence on medical services; but in terms of the entire manual, no.
00:33:40 2 00:33:40 4 00:33:40 5	Kevin Duffy point in time when Norberto Rivera committed suicide? A. Yes. Q. AmeriCor was providing services at that point in time; correct?	002597 2 002559 3 002559 4 002502 5 002007 6 002811 7	A. It has its own operating procedures. Q. Did you ever review those? A. I think we may have reviewed some that would have had an influence on medical services; but in terms of the entire manual, no. Q. When you say "we," who specifically
00:33:40	Kevin Duffy point in time when Norberto Rivera committed suicide? A. Yes. Q. AmeriCor was providing services at that point in time; correct? A. We were providing medical and dental services at the time.	003537 2 003539 3 003539 4 003532 5 003507 6 002507 6	Kevin Duffy A. It has its own operating procedures. Q. Did you ever review those? A. I think we may have reviewed some that would have had an influence on medical services; but in terms of the entire manual, no. Q. When you say "we," who specifically reviewed any Putnam County regs or rules?
023340 4 003340 5 003355 6 003352 7 023764 8	Fevin Duffy point in time when Norberto Rivera committed suicide? A. Yes. Q. AmeriCor was providing services at that point in time; correct? A. We were providing medical and dental	002597 2 002559 3 002559 4 002502 5 002007 6 002811 7	Xevin Duffy A. It has its own operating procedures. Q. Did you ever review those? A. I think we may have reviewed some that would have had an influence on medical services; but in terms of the entire manual, no. Q. When you say "we," who specifically reviewed any Putnam County regs or rules? A. It would have been me and the
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G0:15:57	_	Α.	Not specifically.	•	2040;	15 2	corpora	ition.	
05006:58	_	Q.	Anything in substance that	you çan	02454	ю 3	_		July 1, 2003, did you
1 10	4 remen 5	_			20,463	. 4	have any	y other employn	nent other than with Prison
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(30,57:13	8 intere	stea	in what the security arra	ingements for	00.41:9	8		MR. COON	: Okay,
сп;эт;эт	9 that w	_			C0315	, 9		Do you u	nderstand the
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00:37:28			today?		Q0c61c13	15			yone else, other than
00.37.22 °	-		I don't remember any sp	ecific	99:47:14	16		Prison Health:	
G0:37:26 [*]					C041:75	17	A.	1 was with (Correctional Medical
05-07:37	8 (Did you review any withd		03;41;14	18	Care,		
f etc.v7:40 1	_		re you aware whether New Y		(Main;19	18	다.	Do you recail	what years you worked
anaraz Z			s or regulations or standard		00.41.21	2û	for Correc	ctional Medical C	
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00:33:46 2	2 the Puti	men	County Correctional Facility:	?	C03121	22	Q.	What was vou	ir position there?
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co:\$7:57 2	4 regulat	tions	i.		00:41:34	24	Q.	-	nature of that
0023 50 2	5 G) . /	And how are you aware of th	at?	C031138	25	business?		
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	19:42:47	_	A. Yes.	CDA4 4		A. Right.
į.	****	,	Q. And when was AmeriCor Incorporated?	0::+4:4		Q were there any suicides in any of
	je.	_		_ (00,4÷я)	_	the facilities that it provided services to?
Ι,	 10:47:58	_	The state of the s	00.44:40		A. Not that I recall.
i	0:42:59	_	Correctional Medical Care at the time?	00:44:50	_	Q. How about when you worked for Prison
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- 1	G:43:25		,	05:44:56	-	18 years. I just don't recall specifically.
	0.40.20		 A. Just prior to starting AmeriCor. Q. And do you recall the year or years 	00:44:E8		Q. Do you recall if you had any role or
- 1	0,42:11		you worked, or from when to when, I should say,	00.45.00		involvement in anything pertaining to the
- 1	247:14		you worked for Prison Health Services?	D0t45:09		investigation of any sulcide?
	240:14			60:45:07		A. No.
- 1	143:27		it libby i believe.	00%5.12		Q. In terms of the New York State
1	943:31		Q. And where, if at all, did you work between 1998 and 2001?	02:45:25		general regulations that you referred to earlier,
	:43.32			004524		are you aware of any New York State requirements
	:43:32 :43:34		A. I was in school at the time, getting	604529		for county correctional facilities?
!	:43:34		my master's.	0245/39		A. I don't I don't know that they're
Ī			Q. Any employment?	COMENS	19	defined as requirements. I know that there are
- 1	MODE		A. No.	00:35.52	-	Some standards that apply.
1	N4365 .		Q. Is Prison Health Services still in	00:45:58	21	Q. Do you know if those standards are
1	47:48		business as far as you know?	00:46:50	22	required to be met by the county correctional
- 1	45#0		A, Yes.	00:45:04	23	facilities in New York, or are they just
	42 5 0		Q. And what were the circumstances of	00046:08	24	guidelines, if you will?
ļuz	47:57	25	you leaving there?	00:46:11	25	MR. COON: If you know,
1			COMPU-TRAN SHORTHAND REPORTING	<u> </u>		COMPU-TRAN SHORTHAND REPORTING
I		1	38 Kevin Duffy			40
100	40.50	2	A. The company acquired another firm,		7	Kevin Duffy
į	43:55	3	and they downsized.	00:46:16	3	A. I wouldn't know how to characterize
ł	13:59	4	Q. And did Prison Health Services	00.45. 16	4	them.
1		5	provide medical services in county facilities,	00:46:16	_	Q. Did anybody ever provide you with
,		6	also?	CO:46:18	5	any information from which you can make or form
		7	A. Yes.	00%\$22	6	an opinion on whether or not those standards are
		8	Q. Including in New York?	30-68;38	7	required to be met by county correctional facilities?
ŝ		_	A. Yes.	00:46±0	8	
1	era 1		Q. During the time that you worked for	00:45:33 20:46:34	9	MR. COON: Just note my
1	4:14 1		Prison Health Services and Correctional Medical	00:46:34 1		objection,
GC:4	4 T 25 F	2	Care, were there any suicides in any of the	_	_	You can answer.
	619 1		facilities that you provided medical services to?	604561 T 504562 T		A. The question again, please?
	1		A. I'm sure	20:48:57 1		(Question read) A. Yes.
: 00:4	e:20 1	5	MR. COON: I object to the	OSHESO 1		
00:44	or 1	6	form. When you say "you," Kim —	00047:01 1	_	, , , , , , , , , , , , , , , , , , ,
07:44	k34 1	7	MS. BERG: Meaning the	:::::::::::::::::::::::::::::::::::::::		A. Well, I'm sure I have a copy of them in my office.
l	:36 1		companies.	00:4705 1		
	:25 1		MR. COON: Meaning the	00:4705 1 03:4705 1		Q. And did you, therefore, form an
	2 1			00:47:05 1 50:47:04 2		opinion as to whether or not they're required to
	or 2°			50.47:09 Z 60:47:12 2		be met by county correctional facilities?
	a 2:		A 21 No.			A. These things are very broad and
ûn:42				00047.14 2		cover a wide range of areas. We look at the ones
	39 2 . ⊲ı 2 4		Madical Co. 1	00:47:13 2 :		that affect us.
	o 25	_	g	0:47:19 2 21		Q. Did you ever look at the ones that
		_	COMPU-TRAN SHORTHAND REPORTING	194729 2	o [pertain to the intake or booking process?
			COMPOSTRAN SHORTHAND RECOGNIZE 1			COMPU-TRAN SHORTHAND REPORTING

<u></u>	Case 7:07-cv-02866-CS-GAY Documer	nt 23-20	Filed 05/07/2008 Page 12 of 28
	1 Kevin Dufi		1 Kevin Duffy
90,47:24	2 A. I'm sure I did.	00:49.52	2 is different.
c0:4725	3 Q. Do you recall if you ever looked at		3 Q. Do you know if the Patnam County
. 126	4 any ones pertaining to constant supervision?		4 Correctional Facility form has anything about
е.	5 A. I don't recall any that require	1	5 instituting constant watch on it?
004737	6 that.	00:50:02 {	_
09:47:38	 Q. Do you recall any that indicate 	005004 7	
00.47.A1	8 circumstances under which constant supervision	00:50:06 8	,
00:47:44	9 should be instituted?	G0:50:12 S	_
3004798 1	0 A, No.	00:50:13 10	
60.4745 1	1 Q. Did you ever see a form from the	00:50:20 11	
02.47:51 1.	2 New York State Commission of Correction known as	305021 12	
90,47gs 13	3 the 330 ADM, which I have marked as Plaintiff's	00:50:22 13	-
0047.5: 14	4 Exhibit 1? (Handing)	00:0023 14	
D248:14 12	5 A. I've seen a form that looks very	cna024 15	
CG:18:75 1 0	6 similar to this.	03,6329 16	
00%ens 1	7 Q. Have you ever seen that form?	a:sept 17	Q. For what? What's it used for?
02.1819 1 8	A. Like I said, I've seen forms that	cu205+ 18	_
- } ∞ ₁₀₀ 19	are similar to this. This specific one, I don't	aaşası 19	
CO4632 20) know,	20,50жа 20	
09+∞≈ 21	Q. At the bottom, under the "Action"	00:50:44 21	Q. Are there any policies or procedures
October 22	- Somebody	00.50.46 22	- ·
COA635 23	Section 47 or any bridged coxed	D0:50:51 23	respect to whether an inmate scores eight or
00.4832 24		00:20:34 24	
Сснаят 25	·	00.50.57 25	A. I don't recall specifics regarding
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
2	42		44
1	Kevin Duffy	1	Kevin Duffy
оомкаг 2	Do you see that portion?	00x51;06 2	it.
30,45:40	A. Yes.	00:51.68 3	Q. Are you aware of any policies that
ссивиз 4	 Q. Did anybody ever discuss that with 	00:51:10 4	AmeriCor has with respect to whether an inmate
00.48.47 5	you or provide any Information to you that led	60:50:13 5	has a shaded box checked?
0024855 5	you to understand the New York State Commission	co=120 6	A. Not that I specifically recall.
00:40:54 7	of Corrections' opinion or standard, If you will,	aps _{1:25} 7	Q. Are there any AmeriCor policies
234859 8 204554 8	that a incoming an incoming inmate who has	00.51:24 8	which would require constant supervision for
00,49 07 .10	those criteria, should be placed on constant watch?	005127 9	someone who scores eight or higher on the Suicide
00.4867 .1 0		DD 51:47 10	Prevention Screening Guidelines?
00:45:05 12	MR. COON: Note my objection. You can answer.	20:21:45 11	A. There are policies that address
00:49 -4 13	A. I don't recall any such discussion	00-51-55 12	mentai-health issues. I I don't recall one
224817 14	that specifically identified the requirements of	00x51/56 13	that specifically addresses constant observation
30.4929 15	the State of New York.	50:52x8 14 00:52x8 15	and specific scores on this form.
00:4925 16	Q. And in terms of the form you said	00.52.09 1.5 00:52.11 16	Q. Are you aware of any policies that
00-4825 17	you saw a similar form. Where did you see that?	00.52,15 17	regulre constant supervision for anyone who has
cours 18	A. Well, it's similar to one that is	10:52:15 17	one or more shaded box checked on the suicide screening form?
00.4920	used in the Putnam facility, Putnam County	02:5221 10	A. No.
00.4985 20	Correctional Facility,	00:52:22 20	1
cc:49:35 21	Q. Do you know how the form in the	GD:52:27 21	Q. Are you aware of any withdrawn. In terms of the name of the form,
s 22	Putnern County Correctional Facility differs, if	035223 22	the Suicide Prevention Screening Guidelines,
maaa 23	at all?	02:52:33 23	that's the name of it in Putnam County, as well?
c0:49:30 24	A. It seems to me that the bottom	90:52:37 24	A. I don't recall specifically what's
00:49:48 25	portion following the Total-of-Column-A section,	020209 25	on top of the form,
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
			TOWN OF THE PROPERTY OF THE PR

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ļ	1 Kevin Du6		47	
	Neval Bull,	ļ 1	Kevin Duffy	
	2 Q. Take a look, if you would, at	03:54:36 2	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7	
	3 Exhibit 3. (Handing)	00:5=45 3	risk of either harming themselves or killing	
	4 A. (Witness complies)	- 1 costa 4	themselves?	
[5 Q. Do you recognize just the farm;	05.54:48 5	A. Yes.	
	6 not the handwriting portion but the form, itself	DC.5498 B	Q. Did you ever review any materials	
1	7 as the one that's used in Putnam County?	0054S1 7	that were provided to Putnam County Correctional	
96:52:49	8 A. It looks like it, γes.	00x54:54 8	Facility employees with respect to high-risk	
	9 Q. Do you have any doubts?	00:54±5 9	inmates? Rules, regulations, handbooks; anything	
00:57:53 10		0055.02 10	like that?	
CC:52:57 1 1	 Q. At the top, what's the name of the 	00:55:03 11	A. You're asking me if I'm aware of	
00.5255 12	2 form?	20:55£4 12	what county employees were provided with?	
90092:55 13	Streeting	cossor 13	Q. Yes.	
_ ∤ ∞ss:se 14	4 Guidelines.	C0.55:03 14	A. No.	
003258 15	 Q. Did you ever have the understanding 	02:55:00 15	Q. Did you ever see Exhibit 9, which is	
005200 15	6 that that form is administered to incoming	оожын 16	an Officer's Handbook. And I opened it to Page	
00:53:00 17	7 immates to assess whether or not they are at high	0055:11 17	17, but flip through It just so you can answer my	
90:59x5 18	8 risk for spicide?	00552: 18	initial question. (Handing)	
nn=2.07 19	9 A. Yes.	20:55.29 19	MR. COON: Take a look at	
900007 20	 Q. And did you ever receive any 	00.55.23 20	the first page, the cover page, and	
90:55:12 21	1 information, in terms of total score or shaded	DOS526 21	then you can answer it.	
00:53:17 22		00:5527 22	A. (Witness complles) No.	
±:to:ac 23		00:55.27 23	Q. On Page 17 at the bottom under	
cogogn 24		0355:30 24	"Supervising," do you see the section in bold?	
u25284 25		oc:55:12 25	A. Yes.	
	COMPU-TRAN SHORTHAND REPORTING	1		
!	COM OFTION SHORTHAMD REPURTING	7	COMPLE! RAN SHORTHAND REPORTING	
!			COMPU-TRAN SHORTHAND REPORTING	
' — 1	45 Kevin Duffy	1	48	<u>.</u>
1 00:53:24 2	45	1 (0.55 n. 7	48 Kevin Duffy	
1 00:51:24 2 00:50:00 3	45 Kevin Duffy You can answer.	co=533 Z	48 Kevin Duffy Q. Did you ever receive any Information	
	45 Kevin Duffy You can answer. A. It's my understanding that if	00:5533 2	48 Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission	
100 and 3	45 Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that the	00:55.43 3 00:55.43 4	48 Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision	
оодоло 3 иона-ог 4	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status.	00:55:45 2 00:55:45 3 00:55:45 4 00:55:48 5	48 Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates?	
00:00:00 3 00:00:02 4 00:00:35 5	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number?	00:55:45 2 00:55:45 3 00:55:45 4 00:55:48 5 00:55:56 6	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall.	
00:50:00 3 00:50:02 4 00:50:05 5 00:50:44 6	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me.	00:55:45	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or	
00:53:49 3 00:53:49 7	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that the can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection?	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 6 00:55:47 8	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend	
00:53:51 8	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes.	00:55:45	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention?	
00,000,00 3 00,000,00 4 00,000,00 5 00,000,00 7 00,000,00 8 00,000,00 9	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 6 00:55:45 7 00:55:47 8 00:55:06 9 00:55:06 10	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I	
00,53350 3 00,53350 5 00,53350 7 00,53350 8 00,53350 9 00,5350 70	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that the can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 5 00:55:47 7 00:55:47 8 00:58:06 9 00:56:26 10 00:56:21 11	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall. Q. Did you ever provide any training or require any employees of American to attend training on the topic of suicide prevention? A. You used the word "require," I think,	
00,000,000 3 00,000,000 5 00,000,000 7 00,000,000 8 00,000,000 10 00,000,000 10 00,000,000 10 00,000,000 10	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide?	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 5 00:55:45 7 00:55:45 7 00:55:45 10 00:56:21 11 00:56:21 12	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them.	
00,000,000 3 00,000,000 5 00,000,000 7 00,000,000 8 00,000,000 9 00,000,000 10 00,000,000 10 00,000,000 11 00,000,000 10	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide? MR. COON: Objection to	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 7 00:55:47 8 00:55:47 8 00:55:00 9 00:55:00 10 00:55:21 11 00:55:22 12 00:58:29 13	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them. Q. Was it mandatory?	
00:00:00:00 00:00:00 00:00:00 00:00:00 00:00:	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide? MR. COON: Objection to form.	00:55:45	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or require any employees of American to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them. Q. Was it mandatory? A. I don't recalf.	
00,000,000 3 00,000,000 5 00,000,000 7 00,000,000 7 00,000,000 8 00,000,000 10 00,000,000 11 00,000,000 12 00,000,000 13 00,000,000 14	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide? MR. COON: Objection to form. You can answer.	00:55:45	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk inmates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them. Q. Was it mandatory? A. I don't recall. Q. When was that training made	
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00,000,000 3 00,000,000 5 00,000,000 7 00,000,000 9 00,000,000 10 00,000,000 11 00,000,000 12 00,000,000 14 00,000,000 15 00,000 15	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide? MR. COON: Objection to form. You can answer. A. I'm not sure that I see a difference between that question and the earlier one. If you score more than an eight, you are generally put on observation because you are	00:55:45 2 00:55:45 4 00:55:45 5 00:55:45 5 00:55:45 7 00:55:45 7 00:55:45 7 00:55:45 7 00:55:45 10 00:56:21 11 00:56:21 12 00:56:21 12 00:56:21 15 00:56:21 16 00:56:21 16 00:56:21 17 00:56:32 18 00:56:40 19	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them. Q. Was it mandatory? A. I don't recall. Q. When was that training made available to AmeriCor employees? A. I don't recall. Q. How many times has that training, suicide training, been made available to AmeriCor	
00,000,000 3 00,000,000 5 00,000,000 7 00,000,000 8 00,000,000 10 00,000,000 12 00,000,000 15 00,000 15 00,0	Kevin Duffy You can answer. A. It's my understanding that if someone scores over a certain number, that they can be put on an observation status. Q. What number? A. Eight sounds right to me. Q. That's your recollection? A. Yes. Q. How about whether or not if somebody scores a certain number, they're deemed to be a high risk for suicide? MR. COON: Objection to form. You can answer. A. I'm not sure that I see a difference between that question and the earlier one. If you score more than an eight, you are generally put on observation because you are perceived to be a risk to yourself.	00:55:35 2 00:55:45 4 00:55:45 5 00:55:45 5 00:55:45 7 00:55:45 7 00:55:45 10 00:56:45 11 00:56:45 12 00:56:45 15 00:56:45 16 00:56:45 16 00:56:45 17 00:56:45 19 00:56:45 20	Kevin Duffy Q. Did you ever receive any Information prior to today that, according to the Commission of Correction regulations, constant supervision should be given to all high-risk immates? A. Not that I recall. Q. Did you ever provide any training or require any employees of AmeriCor to attend training on the topic of suicide prevention? A. You used the word "require," I think. Training was made available to them. Q. Was it mandatory? A. I don't recall. Q. When was that training made available to AmeriCor employees? A. I don't recall. Q. How many times has that training, suicide training, been made available to AmeriCor employees since July 1 of '03?	
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co:57:16	2	tecall ove	rything that was in it.			1	_	Kevin Duffy
05:57:08	3	Q.		3.LL	00:58:5	_		and year and the first the time that it
1 22	4	time about	Did you present anything at	tuat	60533			
. 2	5.	A.		_•-	01:06:3	_		the state of the s
93:57.23	6	Q.	I'd have to go back and lo		915000		_	t here today?
00:27:26	7	Α.	Do you recall as you sit here		01:00:04	: 6	• • • •	" hander) meterities het apopte Milell
00:57:27	8	Q.	Not off the top of my head		05:00:17		she was	
{	9	Α,	What would you go back and		CI SED:18	_	٠.	The same to distant the same?
00.57:37. 1		Q.	Probably the orientation of		01:05:20		_	nurse for AmeriCor?
5 05:57:35 1		A.	Where is that maintained cur It's probably in the corpor	-	9: :00:22		Α.	The health-services administrator.
co.57:45 1		office.	ar a brocepty in the corpor		Ç156624		Q.	Are you required, as the president,
00:57:49 1		•	MS. BERG: I'm going to		Q1:04:26			e that action?
cc:sr:46 1		ca	ill for the production of the		32:30:26		Α.	I am not required to approve it,
00:57:48 1	!5		ientation checklist.		61 62.72			it generally happens.
	ıe.		MR. COON: Take it under		D1:05:24		Q.	Do you recall if in Ms. Waters'
ີ ເພລາວ 1	17	ad	lvisement,		050027			approved her bire?
00.57:55 \$			T/DATA REQUESTED:		01,00:38		Α.	No.
00.57.50 1			Other than during the poss	ibba	91:00:38		Q.	As a matter of practice, does
00.55:03 20	0		orientation that you provided,		3 976041			perform any kind of background checks on
00:58:05 2	1		d in any way in providing train		01-02-03			s that it employs?
00:59:09 22	2		mployees on the topic of sulcid		\$1;20;48		Α.	We confirm their licenses and on an
DOSS2:13 2:	3	sticide prev		i¢,	C1-00-94			d basis conduct reference checks and so
CO:SB:17 24	4	_	For me, personally, not the	+ T	01 00;\$7			e do not do a background, criminal
00:58:3 2 5	5	recall.	personally, not the		01:01:01 01:01:07			nd check on them.
					f nı nı na	20	Q.	Do you recall learning anything
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1 20053;19 2	1 2	<u>-</u>	Kevin Duffy	50	B+-B+-D3	1 2		52 Kevin Duffy
	2	Q.	Kevin Duffy Do you know who actually gav	50 e the	01:01:00	2	about Susa	52
90058;19 Z	2	Q.	Kevin Duffy	50 e the	or;91, c 9	2	about Susa in time?	52 Kevin Duffy an Waters' nursing license at any point
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ļ	1 Kaula Dur	Ì	55
01:01.59	Nevin Dan,		1 Kevin Duffy
01:01:52	Q. How often are chose job performance reviews done?	(01,040)	2 required to do by either AmeriCar policy or
,	4	û1 B4;40	3 procedure on the intake of an inmate when they
_	4 A. Generally, annually. 5 Q. Do you review the formal job	91:54:42	4 actually see that inmate?
01.02.1:	6 performance evaluation for each of the nurses?	01-94-45	5 A. Not that I recall.
01:02:14	7 A. Yes.	07:04:46	6 Q. Are they required to perform any
	8 Q. Do you recall anything about	G1:24:XS	7 kind of a medical assessment themselves -
-	9 Susan Waters' evaluations?		8 examination or otherwise?
01×2:19 1 (9 A. Well, they do a general health
01:02:20 11	1 Q. Do you recall anything about	01:05:02 1	7
01:32:21 12	_	612505 1	
01:0≥21 1 3	3 A. No.	0:08:12	The same state include to be taled to be t
on:02:23 14	Q. And for how long has AmeriCor	91:05:12 14	•
01 62:25 15		6105-15 15	the start and to ask doos and
os;on:∞ 16	•	01.04:17 14	
01:02:03 17	A. How long has the company been doing	0:26:28 17	the tracking year.
DE:2234 18		01:05:20 TE	A mary in one paners
CH:22:36 19	Q. Yes.	01:05:25 19	
01:02as 20	A. Since we started.	01:00:27 20	
o:o≥sa 21	MS. BERG: I'm going to	01:05:30 21	
¢1x229 22	call for the production of the job	31:55:02 22	
01:0240 23	performance evaluations for Waters and	01:05:35 23	
ு.ஐ⊯ு 24	Clarke.	P1:55:37 24)
01.9265 25	MR. COON: Take it under	crasse 25	A. It can be the correctional officer
ī	COMPU-TRAN SHORTHAND REPORTING	ļ	
·	BOWN OF THAN SHOKITIAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
· —	54	 	GOMPU-TRAN SHORTHAND REPORTING 56
1 1	54 Kevin Duffy	1	
010248 2	54 <i>Kevin Duffy</i> advisement.	1 2::05:40 2	56
01:02:48 2	54 Kevin Duffy advisement. DOCUMENT/DATA REQUESTED:		56 Kevin Duffy in the booking unit. Q. Do you know in practice what
01:02:48 2 01:02:45 3 01:02:52 4	54 Kevin Duffy advisement. DOCUMENT/DATA REQUESTED: Q. Are you aware of any policies or	01:05:40 2 01:05:46 3 01:05:44 4	56 Kevin Duffy in the booking unit. Q. Do you know in practice what actually happens - whether it's the AmeriCor
01:02:48 2 01:02:45 3 01:02:52 4 01:02:54 5	54 Kevin Duffy advisement. DOCUMENT/DATA REQUESTED: Q. Are you aware of any policies or procedures with respect to what AmeriCor nursing	01:05:40 2 01:25:45 3 01:05:44 4 01:25:21 5	So Kevin Duffy in the booking unit. Q. Do you know in practice what actually happens - whether it's the AmeriCon staff person or the correction officer who
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01:02:48 2 01:02:52 4 01:02:52 4 01:02:52 5 01:02:55 6 01:03:05 7 01:02:07 8 01:03:10 9 01:03:10 9 01:03:12 10 03:00:14 11 01:03:27 12 01:00:23 13	Kevin Duffy advisement. DOCUMENT/DATA REQUESTED: Q. Are you aware of any policies or procedures with respect to what AmeriCor nursing staff is required to do if they actually see an inmate within four hours of them coming into the facility? A. Yes. Q. What are they required to do? A. If, on evaluation, they see an inmate at commitment who is ill or injured, they would perform an evaluation and determine whether or not that person needed to be seen immediately,	01:05:40 2 01:05:40 4 01:05:41 5 01:05:50 6 01:05:50 7 01:05:50 9 01:05:52 9 01:05:02 11 01:05:02 12 01:05:12 13	Kevin Duffy in the booking unit. Q. Do you know in practice what actually happens - whether it's the AmeriCor staff person or the correction officer who administers the medical form? A. Generally, all the forms are filled out by the correctional officer. Q. And are you aware of any requirement that a nurse actually see an inmate within four hours to perform a cursory examination, which would include vital signs? MR. COON: Objection to the form.
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01:02:46 2 01:02:45 3 01:02:52 4 01:02:54 5 01:02:55 6 01:02:55 6 01:02:55 7 01:02:55 7 01:02:55 7 01:02:55 7 01:02:55 7 01:02:55 10 01:02:55 11 01:02:55 12 01:02:55 18 01:02:55 18 01:02:55 18 01:02:55 18 01:02:55 20 01:02:57 21 5 22 01:04:19 23 02:04:75 24	Kevin Duffy advisement. DOCUMENT/DATA REQUESTED: Q. Are you aware of any policies or procedures with respect to what AmeriCor nursing staff is required to do if they actually see an inmate within four hours of them coming into the facility? A. Yes. Q. What are they required to do? A. If, on evaluation, they see an inmate at commitment who is ill or injured, they would perform an evaluation and determine whether or not that person needed to be seen immediately, could be handled there in the facility by the nurse, or should be referred to one of the physician staff. Q. Anything else that the nursing staff is required to do if they actually see the inmate within four hours of the inmate coming in? A. It would depend on what was on—what they found. But for instance, if an inmate came in and said he was on medication, they would attempt to verify that.	0::05:40 2 0::05:40 4 0::05:31 5 01:05:50 6 01:05:50 7 01:05:50 7 01:05:50 11 01:05:00 12 01:05:10 14 01:05:10 14 01:05:10 14 01:05:10 15 01:05:21 18 01:05:21 18 01:05:21 19 01:05:21 21 01:05:21 21 01:05:21 21 01:05:21 22 01:05:31 22 01:05:32 21 01:05:31 22 01:05:32 21	Kevin Duffy in the booking unit. Q. Do you know in practice what actually happens - whether it's the AmeriCor staff person or the correction officer who administers the medical form? A. Generally, all the forms are filled out by the correctional officer. Q. And are you aware of any requirement that a nurse actually sae an inmate within four hours to perform a cursory examination, which would include vital signs? MR. COON: Objection to the form. You can answer. A. The nurse is required, as I indicated earlier, to either see the inmate or review the record within four hours. In fact, the nurse performs conducts a review and does vital signs on every inmate that comes into the facility now. Q. Since when? A. I would hazard a guess - a year and a half.

	Case 7:07-cv-02866-CS-	GAY - Document	23-2	0	Filed 0	5/07/2008	Page 16 of 28	
		57			:		59	
	1 Kevin Dui.			1		Kevin	Duffy	
01:27:05	2 AmeriCor policy at that time?		01:09:29	2	!	You can a	answer.	
C1:07:07	3 A. Yes.		01:09:39	3	• • • •		would be required to	
1 1957	4 Q. And do you recall, p	-	97,9892	4	follow up	on informati	on on an as-needed ba	sis.
} .1	5 and a half ago, was the nurse re-	quired to check	0109:43	5	Again, if	an inmate cla	imed that he was takin	ig
1	6 incoming inmates' vital signs?		01:99:51	6	insulin, f	or instance, ti	te nurse would follow :	ap
97:97:25	7 A. They weren't requ		D1 x254	7	to find o	ut how much i	te was taking, when th	e fast
	8 Q. In practice, do you k		01,08;58	8		s) making sure	that it was continued	and
1	9 A. They did it on an a		å1:10:62	9	so forth.			
eistea 1 -	to this to bull them?		D1:1204	10	Q.		I that part of the	
01:07:25 1 01:07:25 1	1 17 30% 20032 2 7423		91/19:98				ion areas pertaining to	
	2-1		91:10:21	12	drug or al-	cohol use.		
0:07:08 14 0:07:08 14	and of projection, odd an week	ning inmate?	01:00iz	13	Α.	Yes.	•	
1 .			01.10;12	14	Q.		erlCor nursing staff	
91:07:43 1 : 01:07:48 1 :			01:10.15				policy or procedure, If	
01:02:04: 17	- Parana atoming miss are radincy of	being booked?	01:00:19		_		t drug or alcohol use?	
01:07:49 18		-1	01:1023		A.		rould see the inmate ar	
on:07:04 3 0 on:08:02 15		_	21:10:27				it the inmate was repo	
01:08:07 2 (01:12:33				ether or not the inmate	-
01:05:10 21		et's say, by the	01-10:20				ne physician or whethe	
93:23:76 22			\$5:10.47	: .			there was any evidence	a to
012025 23	· · · · · · · · · · · · · · · · · · ·	question to the	01:10.54	-	_	/hat the inmat		
01.0427 24	,	sis as the same	D1.10:57		Q.		say the nurse has to	
07:00:00 25			37:31:30	•		confirm, is that	-	
07,3030 20	COMPU-TRAN SHORT		01:11:02 2	25		with the inmate		
′ 	COM G-MAN SHOAM					COMPU-TRAN	SHORTHAND REPORTIN	(0
i 1	Kevin Duffy	58					5 0	
G1:08:33 2	•			7		Kevin D	uffy	i
01:01:24 3			01:17:54	3	Α.	It can be.	_	
37:39:34 4	Q are they still require		61:11.04	4	Q. A.	Any other mea		
orienas 5	review the paperwork pertaining to		01.11:07	5		Well, if the in		
01.05;54 6	A. Oh. Yes.			6			, for instance, those	
9008на 7	Q. Is that within the four]		7			e nurse so that she cou y of the prescriptions.	#1G]
01XB49 8	as weif?			8	Q.			Ì
n.o. 5	A. Yes.		_	9	drug or alco		th respect to illegal	-
21:23:46 10	Q. What is the purpose of		a1:11:3; 1	-	A.		would attempt to	1
01:00:55 11	nursing staff review the paperwork	_	Districts 1				ne inmate was telling	
01.0R5c 12	the inmate?	- 1	ระบรร 1		her.	verny imise ti	re miniate was tening	
91:08:51 13	A. Well, if an inmate in	dicated that he	01:11:5; 1	3	Q,	Are the numino	staff required, by	l
orms: 14	was on medications, for instance		02:15#4 1				the inmate about what	
отляю: 15	initial questioning, the nurse w	_	on:21 55 1 .				and frequency of use	.
01:03:02 16	find out what medication the in		11.12.03 1		of that drug		and meddency of the	ļ
17 axex::	if continuation was necessary,		n:12:55 1		Α.	Yes.		
019912 18	Q. Prior to the change in s		и:1204 1	8	•		ed to find out when	
01.05:14 19	now nurses see, actually see the in		11.1207 15	9		ast used the dr		ļ
ci-se::e 20	required to see the lamates, before		n:12:ca 2 (their ability, yes.	Ì
01.0823 21	that a nurse conducted only a revie		6:2:1 21			By questioning		
_? 22	paperwork, what, if anything, were	1	1:12:12 22		_	Yes.	are manager	ļ
onu s:28 23	to do at that point?	I	1:12:13 23		_		rsing staff required	ļ.
a1:09:25 24	MR. COOM: Objection	1					ir mitial assessment	
01:05:28 25	form.		1:1213 2 5				e first four hours?	
	COMPU-TRAN SHORTH	AND REPORTING					HORTHAND REPORTING	· [

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1	Kevin Duft,		1	63 1 Kevin Duffy
01:52:23 2	A. Yes.	01-14:38	2	
D1:12:24 3	Q. What are the documents they're	0] -1 4;32	_	
1.26 4		91(14)43	٠.	
, a 5	A. Well, aside from the ones that	C1;34-63	5	_
01.1233 6		01:14:49	6	_
0::12:34 7		21:14:50	7	_
a1:12:30 8		D1::451	8	_
01:1245 9		01:14:50	9	4. 2. Other Wards, 1969 0330116 011
CN:12:43 10	· · · · · · · · · · · · · · · · · · ·	01:14:55	-	
01:5248 11		01:34:55		
01:12:53 12	A. Well, every inmate has to have a	01.14:57		
07:12:55 13		01:15.60		At the harse goes on sime and a new
01::225 14	Q. What's in the medical file?	01:1503		
31.1257 15	A. Well, it starts with the forms that	01:15:07		to the second
05;10;90 16	you were just talking about - the intake	21:15:59		The state of the s
mases 17	screening forms - and then documents are added as	01:102.9 01:15:13		seme form as the intake Progress Note, or is it on a completely separate sheet?
011308 18	needed. For instance, if the nurse had some	1 01.15.17		_
3a123 19	observations, she would put them on a Progress	51:15.20		And the state of t
e1:f2:f5 20	Note and that would become part of the record,	01:35.22		chronologically; so, whatever entry is made,
01.13:19 21	If the lamate got medications while he was in the	01:3522 1 01:15:28		would be made on the same sheet, unless the sheet
02:13:24 22	facility, those would be documented, and that	05:15:20		were full and another one were needed. Q. And with respect to referrals, are
G1:13:27 23	would become part of the record.	01:45:32		The state of the s
01:7029 24	Q. There's a Medication Administration	01:15:36		there any forms that you're aware of that nursing
01:1324 25	Record?			staff completes to refer somebody for, for
	COMPU-TRAN SHORTHAND REPORTING	01:15:29	20	example, mental-health evaluation or a
	62	<u> </u>		COMPU-TRAN SHORTHAND REPORTING
1	Kevin Duffy	ĺ	1	. 64 Karata Bussia
01:13.34 2	A. Yes.		2	Kevin Duffy
DI:13:34 3	Q. And in terms of the Progress Notes,	01:15:42	3	psychiatrist or psychologist?
01:52:39 4	are these required by the norsing staff whenever	01:35.44 01:35.47	_	A. The inmate's name would probably
oninsi 5	they assess or evaluate an Inmate?		5	show up on the shift report as having been seen
DE:13:44 6	A. Yes.		6	and needing to be seen by someone else. Q. What is a shift report?
31.1344 7	Q. Are they required for actions	U1:15.53	7	The second of th
31:13.47 8	that the nursing staff takes, such as when they	01.15:58	8	A. The shift report is a basically,
t:13.50 9	refer the inmate to a psychiatrist or mental-	57:15.50	9	a summary sheet. It shows who was seen and why
10.355 10	health worker, are they required to document it	01:15.03 01:15:17 1		and what supplies are needed. If there are any
0:13:57 11	in a Progress Note?	01:15:1: 1 01:15:11 1		particular cases that need attention.
1.14:00 12	A. Generally, yes.	01.3829 1		Q. And in terms of the shift report,
1.1601 13	Q. Anything else that goes in a	01:16:22		are they prepared on each shift? A. Yes.
:::4.07 14	Progress Note?	DI:16:22 1	-	_
:14:02 15	A. Anything that's applicable to the			Q. And where do the Shift Reports go
1:14:00 16	inmate's health care would go into the file in	01:16.25 1 .		once they're prepared?
104.12 17	one form or another.	01:1928 1 1		A. Well, they're kept in a three-ring
::4:13 18	Q. And in terms of the Progress Notes,	0::16:37 1		binder at the nursing station.
:14:15 19	is this on a form that's already prepared, and	01:3628 1 4		Q. Are you familiar with the fact that
::4::5 19 ::4::37 20	they simply write in the date and their	61:15:39 1 3 2 4		Inmates in the Putnam County Correctional
:1421 21	observations?	01:16.42 20		Facility are sometimes placed on a heightened
2 22		D::16:45 2 *		level of supervision, such as a 15-minute watch,
ne23 23	,	ен::Бив 2 2		or constant supervision?
1425 24		outses 23		A. Yes.
	·	03:15:50 2 4		Q. Is anything supposed to be noted on
CA SUP	they come on staff, on shift, say a Progress Note	or:1652 26)	the shift report for inmates who are on those
	COMPU-TRAN \$HORTHAND REPORTING			COMPU-TRAN SHORTHAND REPORTING

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ı		Case 7	7 .07-cv-02866-CS-GAY Docume	nt 23-2	20-	0 Filed 05/07/2008 Page 18 of 28	_
	1					; 67	
<u> </u>		[+ a! - L+	Kevin Dufi	İ	1	1 Kevin Duffy	
01.18 \$6	3	_	ed levels of supervision?	01:15.4	6 2	2 states, "Alf documentation entries must show a	
01:16:58	,	A.	Ad ittl exheritori fital il	05:19.4	9 3	3 date, time and signature."	
713	5		dy were put on a observation status, th	at ours	2 4	4 A. Yes.	
21:17:67	6	Q.	uid be noted on the shift report.	05:19:5	2 5	 Q. Next couple of lines down: "This is 	
05:17:08	7	-	and the second is to be reduced by	01:19:5	: 6	6 required in order to show compliance with the	
01::7:12	8	A.	any AmeriCor policy or procedure? Not specifically.	g1:19:5°	_	7 contract's requirement that inmates be seen or	
65,17,13	9	Q.	-	[n1200.	_	8 intake screenings be reviewed within four hours	
·	10	-	the of the biant report, is	01:20:04		the state of the s	
25.17.25		the next s	able for the nurse who is coming onto	9:20:08		and the service of th	
01:2749		A.	Yes.	0129:11		managed with a latter than a latter to the life of	
01.17.28		Q,	·	21:20:16			
61:17:20		shift repor		{ 01:20:15		So you bee that:	
01:7:30		A.	Yes.	91:29:16			
08:17:00 1		Q.	Is there any other are there any	C:20:33		The second state of the second	
01:17:26 1	-	-	es that the outgoing nurse would perform	U1.23.18		and any periods of processing Africa Con Mas	
01-27us 1			he incoming ourse aware of what happened	51:20:20		the section of the se	
0::17:41 1		on the shift		012025		The arms of their resident to the	
£1:17:44 2	20	Α.	Basically, all of the information	81.5930		maning removed bit (pill)	
01 77:50 2	21		Is to be transferred is on that sheet.	e1:20:02		The state of the s	
01:17.54 2			Are you aware of any requirement	012246		the many to any paney of procedure	
01:18:22 2	23		ng staff document the date and time	a::20:49			
01:15:05 2			review the medical intake forms?	01:25:5\$		and the state of t	i
05:18.05 2		Α.	Yes.	07:20:55 07:20:58			
				072056	24	5 Is it a requirement of nursing staff	
		(COMPU-TRAN SHORTHAND REPORTING	1		COMPLETE AN SUCCESSARIO DE PARENCE	
·			COMPU-TRAN SHORTHAND REPORTING 66			COMPU-TRAN SHORTHAND REPORTING	
·	1			-		68	
01-15-10	1 2	Q.	66 Kevin Duffy	01:20:55	1 2	68 1 Kevin Duffy	
1	_	Q.	66	01:20:55	1 2 3	68 1 Kevin Duffy 2 to document the date and time of review?	
1	3	Q . procedures	66 <i>Kevin Duffy</i> Are you aware of any policies or		1 2 3 4	68 1 Kevin Duffy 2 to document the date and time of review? 3 A. The nursing staff are generally	
01.1e.15	3 4	Q. procedures if they faile	66 Kevin Duffy Are you aware of any policies or with respect to AmeriCor nurses that,	08/21/00	3	68 1 Kevin Duffy 2 to document the date and time of review? 3 A. The nursing staff are generally 4 required to date and time anything that they do.	
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f,		ĺ	1		Kevin Duffy
		27:35:40	2	intake fo	rms for Spencer Sinkov prior to today?
्री वाद्याच्य	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	01:34:46	3	A.	Yes.
1 44 4	Q. That's required by reason of	01;34;46	4	Q.	Do you recall when for the first
ء ما	AmeriCor's policies; correct?	01,24,90	5	time?	·
01;21;5a 6	7.11 1651	01:04:68	6	A.	No.
01:51:56 /	Q. On the first page of Exhibit 7, do	ð1;54; 5 0	7	Q.	Do you recall why you reviewed them?
91 22:04 8	you see at the bottom right there's a what	613+42	8	Α,	Well, there was an inmate death,
0:22.57 9	looks like a stamp or a rectangle, if you will,	01;34;55	9	so	
0122::3 10	with an arrow?	0:24t08 1	10	Q.	So, you reviewed it because of that?
01:22:1: 11	A. Yes.	01.35;00 1	11	Α,	Yes.
0122:11 12	Q. Do you recognize the handwriting in	91;25;30 1	12	Q.	And when you reviewed it, did you
u12214 13	that?	012500 1	13	follow up	with anybody? Ask questions? Anything?
91.22:14 14	A. Yes.	01.3505 1		A.	I'm sure I did.
002254 15	Q. Whose is that?	D1:34X6 1	15	Q.	Do you recall who you spoke with?
0122:15 16	A. Peter Clarke's.	G1:3508 1	8	A.	I probably spoke with members of my
01:2216 17	Q. And what does it indicate in that	01:35:14 1	7	staff.	·
C+:72:15 18	box?	03:35:76 1	₿	Q.	Do you recall, as you sit here
012220 19	A. It indicates that he reviewed the	01:35:5 1	9	today? Yo	pu're saying "probably."
01:23:30 20	record on May 20 of '06.	01:35:00 2		À.	Well, I'm sure I would have talked
c1:22:30 21	Q. Is there any time noted?	5#3621 2	1	with the	health-services administrator.
01.2235 22	A. No.	01:25:24 2	2	Q.	I don't want you to guess.
ტი,22≊ 23	Q. Did you ever have any occasion to	01:25:26 2:	3		Who did you speak with?
01.22:40 24	personally counsel or cause somebody to counsel	or:3527 2 4	4	Α.	I don't know specifically.
01.22.44 25	Paul Clarke for failing to note the time that he	01.2527 25	5	Q.	Do you recall in substance anything
ļ <u> </u>	COMPU-TRAN SHORTHAND REPORTING				COMPU-TRAN SHORTHAND REPORTING
1	70				72
1	Kevin Duffy		1		72 Kevin Duffy
1 01:22-43 2	Kevin Duffy reviewed Sinkov's record?		_	that you a:	Kevin Duffy
	Kevin Duffy reviewed Sinkov's record? A. Peter Clarke. And the answer is, no.	0:.3549 2	_	that you a: A .	Kevin Duffy
on:20-49 2	Kevin Duffy reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to	0:.35@9 Z	2 t	Α.	Kevin Duffy sked?
01:22:40 2	reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to Clarke for failing to document the timing of any	0:.35/29 Z	2 t 3	Α.	Kevin Duffy sked? Generally, I reviewed the unces of the death.
01:22:43 2 0:22:50 3 01:22:53 4	reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to Clarke for failing to document the timing of any of his entries at any point?	0:.3589 Z 01:3529 Z 01:35:33 4	2 t 3 4 c	A. circumsta Q.	Kevin Duffy sked? Generally, I reviewed the
61:22:50 3 01:22:50 4 01:22:92 5	reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to Clarke for failing to document the timing of any of his entries at any point? A. Not that I'm aware of.	0:3599 2 01:3529 3 01:35:33 4 0:35:34 5	2 t 3 4 c	A. circumsta Q.	Kevin Duffy sked? Generally, I reviewed the inces of the death. Do you recall anything that you
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01:22:49 2 01:22:50 3 01:22:53 4 01:22:59 5 01:22:59 6 01:22:09 7 01:22:09 8 6:22:09 9	reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to Clarke for failing to document the timing of any of his entries at any point? A. Not that I'm aware of. (Cell phone interruption) We are going to take a break at some	01:3529 2 01:3529 3 01:3533 4 01:3534 5 01:3534 7	2 t 3 4 6 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	A. circumsta Q. specifically A. Q.	Kevin Duffy sked? Generally, I reviewed the inces of the death. Do you recall anything that you focused on?
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01:22:25 3 01:22:25 4 01:22:25 5 01:22:25 6 01:22:25 6 01:22:25 7 01:22:25 10 21:23:21 11 01:23:21 11 01:23:21 12 01:23:21 14 01:23:25 16 12:23:25 16 12:23:25 16 12:23:25 17 01:23:25 18 01:23:25 18	Revin Duffy reviewed Sinkov's record? A. Peter Clarke. And the answer is, no. Q. Was any action taken with respect to Clarke for failing to document the timing of any of his entries at any point? A. Not that I'm aware of, (Cell phone interruption) We are going to take a break at some point, aren't we? MS. BERG: Do you need one right now? THE WITNESS: I don't need one right now, but we've been at it for two hours. MS. BERG: I'm fine if you want to take a five-minute break. I have no problem with that. MR. COON: Do you want to	0:3549 2 0:3529 3 0:3524 5 0:3524 5 0:3524 6 0:3541 9 0:3541 11 0:3551 12 0:3552 13 0:3552 13 0:3552 15 0:3552 15 0:3552 16 0:3552 17 0:3552 17 0:3552 18 0:3552 19	22 t	A. circumsta Q. specifically A. Q. communica A. Q. or today's A. (W. Richa.	Kevin Duffy sked? Generally, I reviewed the inces of the death. Do you recall anything that you focused on? No. Do you recall anything that was sted to you? Not specifically, no. Did you review anything to prepare deposition? No. MS. BERG: I'm going to have marked, as Exhibit 23, a copy of a memo from Richard DiMattio to All Nursing Staff, dated November 9, '04, thereupon, one-page 11/9/04 memo from
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Γ		Case 7:	07-cv-02866-CS-GAY· Docymer	ı t 23-2	ე	Filed-0	5/07/2008	Page 20 of 28
ļ	4		Kevin De					75
£1.28:53	2	0	·	ļ	7	1	Kevin	-
01.39.55	3		On the bottom it says, "On the Shift please include 15-minute checks and	01:06;3				ssion to the facility, if
1 33	4	constant		01;39:2				ort noting whether or not
	5	Conscari	Do you see that?	1 01 242				r constant watch?
01.37 02	6	A.	•	01 3≤·3	_			
01:27:02	7	Q.		01995 	_	_	,	r review any shift report
01.37:04	8		It also says, "If you see an inmate al, please document this on the shift	01.5%5	_			as May 20th, 2006?
01:37:07	9		eet as nurse sick call or NSC."	61:50:¢i				
01:37:11	-	report 3n	Do you see that?	101:30,50				ll which nurse completed
21.37 13		Δ	Yes.	ú1-3 s ≱t				
CT:37:14		Q.		57(290)				
01:07:18		requirem		01:02:57				I who the intake nurse was?
01:37:21	-	_	Yes.	01.50.55	-		No.	
DF:37:25			And with respect to the 15-minute	61:X2:05				mber if it was Peter Clarke?
012729			nd constant watch, do AmeriCor nurses	0136000				take nurse?
01:37:33			authority to implement those watches?	23;40;00			Yes.	
01:37:38		A.	Yes.	č1 40 0 9		Α.	Yes.	
01.37.36		Q.	Under what circumstances?	01.4C:69		Q.		see a shift report
G1:37:41 2		A.	If they evaluate an inmate and	56:40:11				e for the May 19th to
01:07:47 2			hat he or she is a risk to themselves,	01,40,18		May 20th	•	
01:27:51			Institute a watch.	01:40:19		A.	I'm sure I d	i
01:27:52 2		Q.	On what do they base that, if	61:40.25				: I'm going to call
91:07:56 2		anything?		01:43:21 01:40:22				tion of Clarke's
01:07:57 2		Α.	Their general nursing assessment	- 1			shift report.	
	-		COMPU-TRAN SHORTHAND REPORTING	Q1:40:23	25			N: I'll take it
·			74				COMPO-TRAN	SHORTHAND REPORTING
Ì	1		Kevin Duffy		1		Kovin D	76
01:5a:00	2	skills.		01:4920	2	land	<i>Kevin D</i> er advisement.	uny
01.0kG3	3	Q.	Are they required to base it in any	D1:H024	3		T/DATA REQUI	
93:32:07	4	way on th	e Suicide Prevention Screening Form?	01040.32		DOCOME		May I have
01:38:10	5	A.	They can.		5			ribit 24 a copy of a
01:08:10	6	Q.	Are they required to base it in any	214035	6			2006, memo from Rich
¢7:3570	7	way on the	e incoming inmate's history of drug or	01 4022	7		to All Staff.	2000, memo from Rich
012824		alcohal us		07:40:40	8	•		ne-page 11/27/06 memo
01:3825	9	Α.	They can.	11:41.03	9			ff was marked as
61:3325 1 0)	Q.	Is there any type of written	01:45:64	•		tiff's Exhibit No	,
21,0 0, 39 1 1	1 (juideline o	r criteria, if you will, that a nurse	Person 1		Q.		r seen that memo from
Criseise 12	2 i	s suppose	d to use in terms of the Suicide	61 41,19		Rich to the		Tour and Memo Hom
012888 13			Screening Form when making a decision	0::41:24 1	3	Á,		specifically seeing
01:3849 14			el of supervision?	DI X1.40 1	4	this one.		,
01:38:52 15	7	À.	I'd have to refer to the Policy	G1:65:41 1		Q.	Do you see at	the bottom where it
012858 16		łanual.		D1341342 1	6			ion, November 28, 2006,
91:36.58 17	•	Q.	You don't know, offhand?	31×142 1				845) 226 number?
01:39:58 18		A.	No.	01:47:53 1		A.	Yes.	
01:08:59 19			And with respect to drug and alcohol	01:41:54 1	9	Q.	To the number	r, (1) (302) 366-1465?
91.39.01 20			u aware of any guidelines or criteria	91.91:50 2	0	A.	Yes.	
67:39:04 21			e is provided with to make a	01:40:59 2	1	Q.	Do you гесодл	ize the (302) phone
₹ 22		_	ion as to the level of supervision?	01:42:02 2	2	number?	_	
a1:39:13 23			Again, I'd have to look at the	01×202 2	3	A.	Yes.	
G1:5815 24		olicy Mar		01:42:02 2	4	Q.	What is that?	ļ
a128:13 25			Do you recall if, in connection with	a14203 2	5	A.	It's my fax m	umber.
·		C	OMPU-TRAN SHORTHAND REPORTING	<u> </u>		. <u></u>	OMPU-TRAN S	HORTHAND REPORTING
			•					

	Case 7:	07-cv-02866-CS-GAY Doçume	nt 2 3-2	0_	Filed 05/07/2008 Page 21 of 28
	1	Kevīn Du.	ļ	1	79 Kevin Duffy
01:42:04	2 Q.	At AmeriCor?	01:50:46		•
01.≭≥05 ×	з А.	Yes.	01:44345	_	and the second s
1	4 Q.	Does that refresh your recollection	0154652		
, 3 8	5 as to whe	ther or not you ever saw this?	01:44:52	_	A. Yes.
01.42:00 €		If it came in to 1465, I'm sure I	619452	_	Q. And at page Bates stamped 545,
G1:42:13 7		don't recall this specific document.		_	
D1M216 {		The fourth paragraph, it indicates	93;44;55		A. Yes.
01:42:19	9 "Vital sigi	s are to be done on all new inmates in	014505	_	Q. Do you see that document?
01:42:24 10			Ú1: SŚrBG		A. Yes.
019224 11	I A.	Yes,	5:46:01	11	Q. Is that also something that you
91:42:24 12	2 Q.	Is this the timing of when the	01.4506	12	submitted to the county, describing the services
01:42:25 13	policy car	ne into effect requiring vitals be done	à1.e5c11		that AmeriCor would provide as part of the
01:42:00 14		four hours of intake?	07:46:14		contract?
	, A.	Probably.	01:45.15	15	A. Yes.
01.4225 16	, Q.	Do you recall one way or the other?	01:45:15		Q. At the page which is Bates stamped
01.4297 17	Α.	No.	- 1		557, at the bottom
25:42:22 18	Q.	It also says, "If there are any	01/4502		MR. COON: Kim, can we just
01:12:11 19	солсетия	at booking related to mental health or	01:45:22	19	back up because you said, is that
01:4245 20	medical, l	et the shift sergeant know ASAP."	стибар	20	something he provided to the county
07:62:10 21		Do you see that?	01.455	21	at the time of the contract?
стигло 22	Α.	Yes.	D1:45:38	22	MS. BERG: Right.
01:9250 23	Q.	Was that a new policy or procedure,	61/85/28	23	MR. COON: I think there's
000250 24	as far as y	ou know?	01.4 5 35	24	addendums to it in this document,
DISE234 25	A.	No.	01;45;41	25	in the exhibit, in the back.
	(OMPU-TRAN SHORTHAND REPORTING	3		COMPU-TRAN SHORTHAND REPORTING
		78	1		60
1	_	Kevin Duffy		1	Kevin Duffy
01,6254 2	Q.	That had always been in existence?	ा अर्डल ।	2	MS. BERG: Okay.
01:4257 3	Α.	Yes.	01:45:42	3	MR. COON: So, I think that
отнази 4		Are there any policies or procedures	01:45:45	4	that probably isn't accurate. You
01:43:14 6		ct to when an inmate will be seen again	21:45.47	5	may want to just ask him
-	initial asse	staff after the intake, after the	01:42:48	<u> </u>	MS. BERG: Well, I meant,
019320 7 019320 8				7	really, just that outline.
01:43:26 9		Are you asking if there are specific of procedures?		8	MR. COON: Okay, sure. I
U1:40:27 10		Yes.	1	9	just think the question wasn't
01/3521 11		None that I recall specifically.	01:46:53		clear. I'm just saying, looking
analisi 12	71.	MS. BERG: I'm going to have	01×255 1		at the back, there's addendums.
01:33:54 13		narked as Exhibit 25, a copy of	01:46:57 1		MS. BERG: All right.
	•		DINSOT 1	J	Q. Mr. Duffy, do you understand that
01:43:27 74		ocuments that were produced by			
01:43.57 74 01:43:59 15		ocuments that were produced by meriCor. Bates stamped 541 to 627	01.4800 1		Exhibit 25 is a compilation of documents, not
01/A359 15	A	meriCor, Bates stamped 541 to 627.	01:48:50 1	5	Exhibit 25 is a compilation of documents, not just one? Is that fair to say?
	(W	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor-	от:не:зо 1 э:не:х« 1	5 6	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes.
otieksse 15 01:44:59 16	A (Wi produ	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked	отнысо 1 отнасо 1 отнасо 1	5 6 7	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A,
01:22:59 15 01:24:59 16 01:24:14 17	, (W. produ as Pla	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.)	отнект 1 отнект 1 отнект 1 отнект 1	5 6 7	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 — it's a three-page
01/44/29 16 01/44/29 17 01/44/4 17 01/44/4 18	(W. produ as Pla Q.	imeriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.) lust take a look, if you would, at	отнысо 1 отнасо 1 отнасо 1	5 ; 6 7 9	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there.
01:44:00 16 01:44:00 17 01:44:00 18 01:44:00 19	(W. produ as Pla Q. the pages t	imeriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiffs Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The	01:48:20 1 01:48:20 1 01:48:20 1 01:48:20 1	5 : 6 7 3 :	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that?
01/4309 15 01/4409 16 01/4409 17 01/4408 18 01/4430 19 01/4430 19	(W. produ as Pla Q the pages t first is Sche	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The dule A, the Putnam County insurance	отнико 1 отнико 1 отнико 1 отнико 1 отнико 1 отнико 2	5 ; 6 ; 7 ; 9 ;	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that? A. Yes.
0194359 15 019439 16 019438 17 019438 18 019430 19 019434 20 019430 21	(W. produ as Pla Q. the pages t first is Sche requiremen	imeriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiffs Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The	01:48:20 1 01:48:20 1: 01:48:20 1: 01:48:20 1: 01:48:20 2: 01:48:2	5 ; 6 ; 7 ; 9 ; 1 ;	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that? A. Yes. Q. Did you submit that Scope-of- Services
otresse 15 otresse 16 otresse 17 otresse 18 otresse 19 otresse 20 otresse 21 2 22	(W. produ as Pla Q. the pages t first is Sche requiremen certificates	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The dule A, the Putnam County insurance ts; and a few pages after that, the	01:46:20 1 01:46:20 1 01:46:20 1 01:46:20 1 01:46:20 2 01:46:12 2 01:46:12 2 01:46:12 2 01:46:12 2 01:46:12 2 01:46:12 2 01:46:12	5 : 6 : 7 : 9 : 0 :	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that? A. Yes. Q. Did you submit that Scope-of- Services outline to the County of Putnam?
otivassa 15 otivassa 16 otivassa 17 otivassa 18 otivassa 19 otivassa 20 otivassa 21 iz 22 otivassa 23	(W. produ as Pla Q. the pages t first is Sche requiremen certificates	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The dule A, the Putnam County insurance its; and a few pages after that, the of insurance.	01:48:20 1 01:48:20 1 01:48:20 1 01:48:20 1 01:48:10 2 01:48:10 2 01:48:12 2 01:48:14 2 01:48:14 2	55 : 66 : 77 : 73 : 73 : 73 : 73 : 73 : 73	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that? A. Yes. Q. Did you submit that Scope-of- Services outline to the County of Putnam? A. Yes.
otresse 15 otresse 16 otresse 17 otresse 18 otresse 19 otresse 20 otresse 21 	(W. production product	meriCor, Bates stamped 541 to 627. hereupon, packet of AmeriCor- ced documents was collectively marked intiff's Exhibit No. 25, for id.) lust take a look, if you would, at hat I had marked as Exhibit 25. The dule A, the Putnam County insurance its; and a few pages after that, the of insurance.	01:46:20 1 01:46:20 1 01:46:20 1 01:46:20 2	55 : 66 : 77 : 73 : 73 : 73 : 73 : 73 : 73	Exhibit 25 is a compilation of documents, not just one? Is that fair to say? A. Yes. Q. And with respect to the Schedule A, which starts at Page 545 it's a three-page outline there. Do you see that? A. Yes. Q. Did you submit that Scope-of- Services outline to the County of Putnam? A. Yes.

1	Case 7:07-c v-02866-CS-GAY Documen	t 23-20	Filed 05/07/2008 Page 22 of 28
			83
01:45:22 2	The first branit,		1 Kevin Duffy
01:49:29 3	and a service of the		Note that we discussed earlier.
-22 4	A. Okay.	91:48:13	and the second of the form, are
3 5		01:48:55	and, required to repeat this brack in brings in
] ct:46:30 6	•	01:45:13	The state of the s
01:46:34 7	what I submitted?	ļ 01:48:20 (The state of the s
on:48as 8	Q. Yes.	01:40:27 7 01:45:25 8	and the state of t
01:46:35 9	A. Yes.	01:48a3 B	
D1246226 10	Q. Was this part of the contract that	013824 10	
01:45.37 11	you entered into?	01.483! 11	
c1:46:34 12	A. Yes.	one 12	,
01×629 13	Q. And in terms of the Receiving	01:19:29 13	_
0155842 14	Screening at the bottom of Page 557, It indicates	0155555 14	
craese 15	that "A registered nurse will then review these	51:44HS 15	
01 явля 16	forms and, as necessary, perform additional	01:4851 16	•
01жа54 17	evaluations and tuberculosis screening within	01:48.54 17	
000488-18	four hours."	61.42.57 13	
c1:46:50 19	Do you see that?	01:48:25 19	
01x659 .20	A. Yes.	angen 20	i
D1:49:09 21	Q. It then indicates, "The Receiving	01:29:13 21	Do you see that?
01:07:22 22	Screening will, at minimum, include the	ə::49:13 22	A. Yes.
01:47:54 23	following:" And then, there are numbers one	pring:r₄ 23	Q. When is the mental-health staff
91:47:05 24	through six.	03:49:15 24	required to refer inmates who have met those
o::+7:97 25	A. Yes.	91:49:21 25	criteria to mental health?
	COMPU-TRAN SHORTHAND REPORTING	i	COMPILTEAN SUCCESSAND PERCETING
		<u> </u>	COMPU-TRAN SHORTHAND REPORTING
) .	82		84
1	Kevin Duffy	1	84 Kevin Duffy
01.47.57 2	Kevin Duffy Q. Are those receiving-screening	1 013954 2	84 Kevin Duffy MR. COON: Objection to the
91:47:11 3	Kevin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the	01049:25 3	84 Kevin Duffy MR. COON: Objection to the form.
91147111 3 91147115 4	Kevin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the corrections personnel, or both?	01:45:25 3	84 Kevin Duffy MR. COON: Objection to the form. A. You mean, when are the nursing staff
91147511 3 91147515 4	Kevin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the corrections personnel, or both? A. Both.	01:49:25 3 01:49:25 4 01:49:27 5	Kevin Duffy MR. COON: Objection to the form. A. You mean, when are the nursing staff required?
01:47:11 3 02:67:15 4 01:47:22 5	Kevin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the corrections personnel, or both? A. Both. Q. With respect to number two:	01:49:25 3 01:49:25 4 05:49:27 5 01:49:26 6	Kevin Duffy MR. COON: Objection to the form. A. You mean, when are the nursing staff required? Q. Yes; I think I screwed that up,
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0147111 3 0147121 4 014722 5 01.4723 6 014722 8 014722 9 014722 9 014722 10 014723 11 014723 12 014723 14 014724 15 014724 16 014724 17 014724 18	Kevin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the corrections personnel, or both? A. Both. Q. With respect to number two: "Behavior observations, including whether the inmate is under the influence of alcohol or drugs or in need of detoxification." Do you see that? A. I'm sorry. Where are you at? Q. Number two, under the minimum. A. Okay. And the question was? Q. The question is, first, do you see where I'm taking about? A. Yes. Q. And is the AmeriCor nursing staff required to note what they observe and what they	01:48:25 3 01:49:25 4 06:49:27 5 01:49:26 6 01:49:26 8 01:49:27 10 01:49:27 10 01:49:45 13 01:49:45 13 01:49:45 14 01:49:45 15	Kevin Duffy MR. COON: Objection to the form. A. You mean, when are the nursing staff required? Q. Yes; I think I screwed that up, didn't I? When are the nursing staff required to refer an inmate, who meets that criteria, to mental-health staff? Is that done at intake? A. They, generally, would make the referral at the time that they reviewed the documents. Q. So, that would be within the four hours of intake? A. Yes.
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01:47:11 3 01:47:11 4 01:47:22 5 01:47:23 6 01:47:23 7 01:47:22 8 01:47:22 9 01:47:23 10 01:47:23 11 01:47:23 13 01:47:23 14 01:47:23 14 01:47:24 15 01:47:24 16 01:47:24 17 01:47:24 18 01:47:24 19 01:47:25 20 01:47:25 20 01:47:25 21 1: 22 01:48:02 23 61:48:04 24	Revin Duffy Q. Are those receiving-screening minimums done by the AmeriCor staff, the corrections personnel, or both? A. Both. Q. With respect to number two: "Behavior observations, including whether the inmate is under the influence of alcohol or drugs or in need of detoxification." Do you see that? A. I'm sorry. Where are you at? Q. Number two, under the minimum. A. Okay, And the question was? Q. The question is, first, do you see where I'm talking about? A. Yes. Q. And is the AmeriCor nursing staff required to note what they observe and what they learn with respect to inmates who are under the influence of alcohol or drugs or in need of detoxification? A. Yes. Q. Where do they note that? A. If it cannot specifically be entered	01:48:25 3 01:48:25 4 06:48:27 5 01:49:26 6 01:48:26 8 01:48:26 9 01:49:27 10 21:48:46 12 01:48:45 13 01:48:45 13 01:48:45 14 41:48:40 15 01:48:51 16 01:48:51 17 01:48:51 18 61:48:51 19 01:50:00 20 01:50:00 20 01:50:00 22 01:50:00 22	Kevin Duffy MR. COON: Objection to the form. A. You mean, when are the nursing staff required? Q. Yes; I think I screwed that up, didn't I? When are the nursing staff required to refer an inmate, who meets that criteria, to mental-health staff? Is that done at intake? A. They, generally, would make the referral at the time that they reviewed the documents. Q. So, that would be within the four hours of intake? A. Yes. Q. And are you familiar at all with the mental-health form which has been cut off but appears to say "Routing Sheet" at the top? A. Yes. Q. Is that a form that AmeriCor nurses would complete to refer somebody for mental-health assessment or evaluation?

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i	1 Kevin Duffy	· 1	Kevin Duffy
01:50:15	2 created by Peter Clarke with respect to	01:50:50 2	A. My conversations with Peter.
01:50:76	3 Spencer Sinkov?	1015007 3	Q. Well, what did he tell you?
119	4 A. Not that I recall.	n:52:0= 4	A. He told me that Mr. Sinkov was alert
1 0	5 Q. Take a look, if you would, at	01:50:17 5	and responsive and conversing with, and joking
01.50.22	6 Exhibit 3, the suicide screening for Mr. Sinkov.	c1:20:20 6	
01:56:29	7 It's probably on the bottom of that pile there.	01:53:572 7	_
01:50:33	8 A. Here it is. Okay.	03:53:03 8	
01.50.76	9 Q. He scored eight or higher. In fact,	21:53:15 9	A. As I recall, he told me that he
01:20:39 1	10 he had a total of ten.	c15591 10	
01:50:00 1	i1 Do you see that?	n 5265 11	
01:50:45 1	2 A. Yes.	01:52:52 12	Q. Did he tell you anything else?
21:53:31 1	 Q. And in terms of the yes questions, 	a1;50;50 13	A. Not that I recall specifically.
21:5006 1 -	4 he answered yes to some of the ones noted in the	01:54:55 14	Q. At the Bates stamped Pages 558
ot:50:51 1:	5 AmeriCor services agreement, those that are in	0154:11 15	let me back up for a second. Sorry.
er∉e⊴a 1	6 the shaded boxes.	01:54:12 16	Did Peter Clarke ever tell you that
u15059 1 .	7 Do you see that?	01:54:14 17	апу of the answers on the form, he believed
01:90.59 1 -	8 A. Yes,	21:24:21 18	should have been changed?
		015621 19	A. Not that I recall.
01:51:53 20	Checked off in the "Yes" column.	ಎಂ⇔≈ 20	Q. Go back to Bates stamp 558, which is
อเลเจร 21	1 A. Yes,	01;54.25 21	the portion I just read to you: "Inmates that
01:51:05 22	 Q. Under those circumstances, was Peter 	01:54:20 22	receive a suicide screen score of eight or
G1:51:08 23	3 Clarke required to refer Spencer Sinkov for a	#:##as 23	higher, or who answer "Yes" to those questions,
01-51:17 24	4 mental-health evaluation?	01.54.35 24	will be referred to mental-health staff for
₹25 præ1:29		01:51.4: 25	further evaluation."
i	COMPU-TRAN SHORTHAND REPORTING	<u> </u>	COMPU-TRAN SHORTHAND REPORTING
1	86	ŀ	88
1	1 Kevin Duffy	1	Kevin Duffy
01.51.92	1 Kevin Duffy 2 Q. What does that mean?	7 01:56-21 Z	Kevin Duffy There's nothing in there that leaves
01:51:33	1 Kevin Duffy 2 Q. What does that mean? 3 A. Well, that means, if, after having	01:54:41 Z 01:54:43 3	Kevin Duffy There's nothing in there that leaves any discretion to the nurse to very from that, is
01:51:33 3 01:55:36 4	1 Kevin Duffy 2 Q. What does that mean? 3 A. Well, that means, if, after having 4 reviewed the document, that he did not agree with	01:56:43 Z 01:56:43 3 01:54:50 4	Kevin Duffy There's nothing in there that leaves any discretion to the nurse to vary from that, is there?
01:51:33 3 01:52:36 4 01:51:39 5	Kevin Duffy Q. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if	01:5641 Z 01:5643 3 01:5450 4 01:5450 5	There's nothing in there that leaves any discretion to the nurse to very from that, is there? A. No.
01:51:33 3 01:51:36 4 01:51:39 5 01:51:42 6	Kevin Duffy Q. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if that had the effect of lowering the total score	01:54:41 Z 01:54:43 3 01:54:50 4 01:54:50 5 01:64:55 6	Kevin Duffy There's nothing in there that leaves any discretion to the nurse to vary from that, is there? A. No. Q. Did you ever have any conversations
01:51:93 3 01:52:36 4 01:51:39 5 01:51:42 6 51:51:45 7	Kevin Duffy Q. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if that had the effect of lowering the total score or eliminating some of these special questions,	01:50:41 2 01:50:43 3 01:54:50 4 01:54:55 5 01:54:55 6	Kevin Duffy There's nothing in there that leaves any discretion to the nurse to vary from that, is there? A. No. Q. Did you ever have any conversations with Peter Clarke about whether or not he had
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01:51:33 3 01:51:34 4 01:51:35 5 01:51:35 7 01:51:35 8 01:51:35 9 01:52:00 10 02:52:02 11 01:52:05 12 01:52:05 13 01:52:05 15 01:52:16 15 01:52:16 15 01:52:16 15 01:52:16 17 01:52:16 18 01:52:16 18 01:52:17 19 01:52:17 19 01:52:17 20 01:52:17 20	C. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if that had the effect of lowering the total score or eliminating some of these special questions, he could, based on his nursing assessment, elect not to make the referral. Q. And did you ever receive any information, prior to right now, that would indicate to you that Peter Clarke formed the opinion that the total score or the shaded boxes were inaccurately or inappropriately noted on Exhibit 3? A. The general answer to your question is, yes. And the specific answer to your question is, no. Q. What does that mean? A. That means that based on my understanding of Peter's review of the case, that Peter did not believe that Mr. Sinkov was a danger to himself.	01:5041 2 01:5043 3 01:5450 4 01:5455 6 01:5503 7 01:5500 8 01:5515 10 01:5520 11 01:5520 12 01:5520 13 01:5520 15 01:5525 16 01:5525 16 01:5525 16 01:5525 16 01:5525 17 01:5525 18 01:5525 20 01:5526 21 01:5525 22	There's nothing in there that leaves any discretion to the nurse to vary from that, is there? A. No. Q. Did you ever have any conversations with Peter Clarke about whether or not he had information about Spencer using heroin? A. Not that I recall. Q. Did you ever come to learn, as noted in Exhibit 5, that Susan Waters completed a Mental-Health Referral Routing Sheet for Spencer Sinkov and wrote under A. I'm sorry. Wait a minute. Where is Exhibit 5? Q. I have it right here. I'll show it to you. A. Oh, okay. I'm sorry. Go ahead. Q. She wrote under "Observations:" "History of substance abuse and family problems." (Handing) A. (Witness peruses document) Okay.
01:51:33 3 01:51:34 4 01:51:32 6 51:51:32 6 51:51:34 9 01:52:30 10 02:52:32 11 01:52:32 12 01:52:32 14 01:52:32 14 01:52:32 15 01:52:32 16 01:52:32 17 01:52:32 19 01:52:32 19 01:52:32 20 01:52:02 23	C. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if that had the effect of lowering the total score or eliminating some of these special questions, he could, based on his nursing assessment, elect not to make the referral. Q. And did you ever receive any information, prior to right now, that would indicate to you that Peter Clarke formed the opinion that the total score or the shaded boxes were inaccurately or inappropriately noted on Exhibit 3? A. The general answer to your question is, yes. And the specific answer to your question is, no. Q. What does that mean? A. That means that based on my understanding of Peter's review of the case, that Peter did not believe that Mr. Sinkov was a danger to himself. Q. What do you base your understanding	01:5643 2 2 01:5643 4 0:54:55 5 6 01:25:03 7 01:25:06 8 01:25:07 11 01:25:25 11 01:25:25 12 01:25:25 12 01:25:25 18 01:25:25 18 01:25:25 18 01:25:25 18 01:25:25 19 01:25:25 2 2 01:25:25 2 2 3	There's nothing in there that leaves any discretion to the nurse to vary from that, is there? A. No. Q. Did you ever have any conversations with Peter Clarke about whether or not he had information about Spencer using heroin? A. Not that I recall. Q. Did you ever come to learn, as noted in Exhibit 5, that Susan Waters completed a Mental-Health Referral Routing Sheet for Spencer Sinkov and wrote under A. I'm sorry. Walt a minute. Where is Exhibit 5? Q. I have it right here. I'll show it to you. A. Oh, okay. I'm sorry. Go ahead. Q. She wrote under "Observations:" "History of substance abuse and family problems." (Handing) A. (Witness peruses document) Okay. Q. Were you aware of that?
01:51:33 3 01:51:35 4 01:51:35 5 01:51:35 7 01:51:35 8 01:51:35 9 01:52:05 10 02:52:05 12 01:52:05 12 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 15 01:52:05 25 01:52:05 25 01:52:05 25 01:52:05 25 01:52:05 25	C. What does that mean? A. Well, that means, if, after having reviewed the document, that he did not agree with some of the answers that were checked "Yes" if that had the effect of lowering the total score or eliminating some of these special questions, he could, based on his nursing assessment, elect not to make the referral. Q. And did you ever receive any information, prior to right now, that would indicate to you that Peter Clarke formed the opinion that the total score or the shaded boxes were inaccurately or inappropriately noted on Exhibit 3? A. The general answer to your question is, yes. And the specific answer to your question is, no. Q. What does that mean? A. That means that based on my understanding of Peter's review of the case, that Peter did not believe that Mr. Sinkov was a danger to himself. Q. What do you base your understanding	01:5643 2 2 01:5643 5 5 01:5633 7 01:5633 10 01:5633 11 01:5633 14 01:5633 15 01:5633 16 01:5633 17 01:5633 18 01:5633 19 01:5634 20 01:5634 21 01:5634 21 01:5634 22 01:5534 24	There's nothing in there that leaves any discretion to the nurse to vary from that, is there? A. No. Q. Did you ever have any conversations with Peter Clarke about whether or not he had information about Spencer using heroin? A. Not that I recall. Q. Did you ever come to learn, as noted in Exhibit 5, that Susan Waters completed a Mental-Health Referral Routing Sheet for Spencer Sinkov and wrote under A. I'm sorry. Wait a minute. Where is Exhibit 5? Q. I have it right here. I'll show it to you. A. Oh, okay. I'm sorry. Go ahead. Q. She wrote under "Observations:" "History of substance abuse and family problems." (Handing) A. (Witness peruses document) Okay. Q. Were you aware of that? A. Was I aware of this document?

	Case 7:07-cv-02866-CS-GAY Decumen	nt 23-20	Filed-05/07/2008 Page 24 of 28,
1	:	. 1	ः Kevin Duffy
31 55 50 2		01=02. 2	
0:56:00 3		01.55.27 3	
72 4	Q. Do you recall if you've seen it	21.52:24 4	Q. Who is the screening officer?
5	before today?	აცავა 5	A. The correctional officer, who did
niėsus 6	A. Not specifically.	e1#80# 6	· ·
21 55.08 7	Q. Do you have any idea when Susan Waters	015534 7	Q. It wouldn't be the nursing staff?
e::98.10 8	completed that?	01.58.37	A. Nurses are not correctional
01.58.15 9	A. No.	01:58.4C 9	officers, no.
01-5572 10	Q. And there's no time noted on that	DE:58:40 10	Q. But are nursing staff considered to
01 5515 11	document, is there?	O1:58:34 11	
51.56.16 12	A. Not that I see, no.	c1:58.45 12	A. No.
31:56.01 13	Q. And with respect to Ms. Waters, do	c1:56:45 13	Q. At the bottom of the form, Exhibit 3,
c1:58:24 14	you understand that she came on the shift after	01:55:47 14	
01:5520 15	Peter Clarke's shift ended?	n:52;51 15	provider actions."
 	A. Yes.	01.54:52 16	A. Yes
a1,56:51 17	Q. And did you ever speak with	otisaisa 17	Q. That portion is blank, also; correct?
35.58:36 18	Ms. Waters as to the basis for her conclusion or	ot:58.35 18	A. Aside from the exhibit stamp, yes.
or.58.42 19	observation that Spencer had a history of	G136655 19	Q. And with respect to that area, is it
01.2024 20	substance abuse?	01.520: 20	nursing staff, AmeriCor nursing staff, that's
01.65.45 21	A. If I did, I don't recall it.	01:58:05 21	supposed to complete that?
01:5847 22	Q. Do you recall if you had any	D1:59:07 22	A. While they wouldn't necessarily
01:56:49 23	conversations with her about anything pertaining	35:28:16 23	complete this portion of it, we discussed their
01:55:1 24	to family problems Spencer may have had?	01:59:19 24	entries in the Progress Notes and so forth.
01:5:55 25	A. No.	01-58:22 25	Their actions might be in there.
	COMPU-TRAN SHORTHAND REPORTING	i	COMPU-TRAN SHORTHAND REPORTING
	90	•	92
1	Kevin Duffy	1	Kevin Duffy
21:58:58 2	Q. Did you ever speak with anybody	2:5044 2	Q. So they wouldn't, under any
ot:56:50 3	about Including Waters why it was that	on:58.27 3	circumstances, fill out the bottom of Exhibit 3
01.57.03 * 4	Waters completed a Mental Health Referral Sheet?	0126929 4	for the medical staff actions?
0121709 5	 I don't recall discussing it with 	იქურია 5	A. I didn't say that.
91-57-17 6	her, no.	01.5033 6	Q. Do they in practice?
51:57:12 7	Q. Did you ever inquire of anyone why	an 59554 7	A. But typically what would happen
0:.57:17 8	Waters would have completed a Mental Health	D1.50:38 8	would be, they would review this form and then
01 57 20 9	Referro: Sheet on her shift, but Peter Clarke did	и⊴яя 9	they would document their actions in the Progress
01.97:25 10	not complete one on his?	015R46 10	Notes.
2005028 11	A. No.	015244 11	Q. Is there any requirement for a
01:57:24 12	Q. Did you ever speak with Waters about	01 5944 12	nurse, who comes on shift after an Intake is
019730 13	whether or not she reviewed Spencer's suicide	01:50.52 13	completed, to review the new inmate's medical
61.57.37 14	screening form?	D):58:54 14	packet, including the screening?
01:57:38 15	A. Not specifically.	ж:5926 15	A. There's no requirement if the inmate
1 01:57.41 16	Q. On the form, the suicide screening	azabaz 16	was screened on a shift prior to hers.
or:snse: 17	form, itself, Exhibit 3, at the bottom, there's a	czaxas 17	Q. Are you aware of any policies that
\$1:57:5\$ 18	section for mental health referral,	a200:17 18	the Putnam County Correctional Facility has with
91:58:22 19.	Do you see that?	a200:21 19	respect to what to do when inmates score eight or
01:50:03 20	A. Yes.	02:00:27 20	higher on the Suicide Prevention Screening Form?
01 05:14 21	Q. And that part is blank; correct?	02:00:31 21	A. Am I aware of what's in the facility
· 22	A, Yes.	025034 22	manual?
41:55:17 23	Q. Do you know who is supposed to fill	C2000.05 23	Q. Yes.
01:53:15 24	-	020207 24	A. Not specifically.
c1.5a;za 25	staff, both?	02000м 25	Q. Have you ever had any conversations
L	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING

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	1 Kevin Dui.		95 1 Kevin Duffy
070035	2 with anyone about what the Putnam County		2 A. I could look.
22;30:40	3 Correctional Facility regs provide?	02.03:00	3 MS. BERG: Okay. I call for
f 65 6	A. In the course of five years, I'm	02.59:10	4 the production of any documents that
ا جد	sure I must've. I don't recall any specifics,	62x33.12	5 would reflect the dates of the
og:po:ša (62,03:13	6 meetings.
02:00:59	connection with Spencer Sinkov's death, about	0209:15	
020101 \$		02:22:55	- Inter-OCOM, I is take it
oz:0::0s 9		02:03:15	-
222129 10		02:03:17 -16	
0201.06 11	A. I'm sure, as a matter of general	02:00:20 3 *	
az:0::10 12		92:323 12	
62:51:12 13			3 together?
9201.13 14		0203:25 14	•
020f:15 15	· –	02:20:20 15	
G2:24.22 16		22:23:29 16	_ -
02-01-25 17	the matter was reviewed. I don't recall	G2.03:59 17	
72V:24 18		0200:24 18	_
220121 19		pa:popr 19	
02.01.31 20	Q. Did you ever speak with Sheriff	02:03:46 20	
0201.53 21	Donald Smith at any point in time about	0200:07 21	
02:01:36 22	Spencer Sinkov?	020048 22	
02:01:37 23	A. Oh, I'm sure I did.	ാമാനത 23	A. No.
02:01:36 24	Q. Do you recall doing so as you sit	02:02:51 24	Q. Do you recall anything that Smith
02:01:40 25	here today?	0200:50 25	
ĺ	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
	94		96
1	Kevin Duffy	1	Kevin Duffy
(de:01% 2	 Again, there were meetings following 	020254 2	A. Sheriff Smith? No.
\$2.0; 45 3 .	Mr. Sinkov's death. I don't recall which ones	œ:ω ₅₅ 3	Q. Do you recall anything that LeFever
02.01 S 0 4	the sheriff was part of and which ones he wasn't.	c2:54:00 4	said?
02.01:54 5	Q. Who else attended those meetings?	 0294:30 5	A. No.
42:0f:57 6	A. Probably Captain Robert LeFever, L-e	020400 6	Q. Anything O'Malley said?
a752,02 7	F-e-v-e-r, with a capital F. And at that point	02:04:02 7	A. No.
8 ersvsm	in time, possibly Lieutenant Patrick O'Mailey,	G2:04:02 8	Q. Anything DiMattle said?
02:32:19 9	O-m-a-i-i-e-y.	02:04:04	Â. No.
02:02:4-10	Q. Anyone else who attended these	æ:ree: 10	Q. Do you recall anything more
DZ0237 11	meetings?	62.54.97 11	specific, other than what you've just told us;
oq:¤q:21 12	A. The health-services administrator	02.04:10 12	namely, that it was about the circumstances of
C2,02,05 13	would have been involved.	07:04:12 13	his death and who was involved?
02.0265 14	Q. Was that Mr. DiMattio?	22:04:14	A. No.
020x3/ 15	A. Yes. And there may have been an	020k16 15	Q. Do you recall if particular names
C2:0344 16	administrative sergeant, and I don't know who	020120 16	were given as to who was involved?
02ю2ят 17	that would be.	02:04:24 17	A. Well, I know that as a matter of
02.0247 18	Q. How many such meetings did you	02.04.25 18	record, that our staff involved Peter Clarke and
02.0251 19	attend?	62:04:31 19	Susan Waters.
02:02:57 20	A. I I don't recall,	02:06:39 20	Q. Do you recall anything that you or
72:02:55 21	Q. Can you recall anything about the	∞o×as 21	DiMattio said about Waters?
, 22	dates of the meetings?	42.54.58 22	A. Again, it was just a general review
20252 23	A. No.	0204:42 23	of what happened.
ozadka 24	Q. Do you have any documents that would	62°9493 24	Q. Did you review documents during the
∞oose 25		25 0444	maetings?
	COMPU-TRAN SHORTHAND REPORTING		COMPU-TRAN SHORTHAND REPORTING
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.		1	97			99
ļ		_	Kevin Duh,		1	Kevin Duffy
	2:24:45	_	A. No. I think I conducted a review of	02:09:36	2	County's regulations refer to form 330 ADM, but
ļ°	2.04 58	_	the medical record at the office.	G2:38:39	3	it's not used in the facility?
,	50		Q. Did you have any outcome to the	0205,41	4	A. No.
1.	14	_	meetings, any conclusions being reached; anything	02:08:41	5	Q. Are you aware of any policies or
	2.05.08	_	like that?	02:08:55	_	procedures that AmeriCor has with respect to
- fr	216:57	7	A. Not as a result of those meetings,	02:05:55	7	providing medication or other detox-type
	2.05:17		not specifically, no.	95:09:00	8	procedures for inmates who come into the
	2.05:18	9	Q. How about as a result of anything	02:09:08	9	facility, having used drugs or alcohol?
i	2:06:19		else?	02:09:11		 A. There are policies and procedures.
- 1	2::5.20		A. Well, as I recall, we initiated the	JZ:09:15		I don't recall specifically which ones.
- 1	2:05:23		collection of vital signs on all new commitments	62:59:17		Q. Do you recall anything about what
	2:05:42		as a result of the report from the State Commission.	02:03c; 8	•	they provide?
- 1	1:05:42 (:5\$:44		•	PZ:05:19		A. Well, as I mentioned earlier, if an
	(155649 205:47	_	, , , , ,	02:50:2%		Inmate comes in on medications, we attempt to
- 1	:05:54	-	doing as a result of your review or these	02:09:29		verify them and continue them in order to ensure
5	::::::::::::::::::::::::::::::::::::::		meetings pertaining to Spencer? A. Not specifically.	020536		continuity of care.
	05.57			02:08:37		Q. Did anybody ever discuss with you
- 1	:08.57		, , , , , , , , , , , , , , , , , , , ,	62:09:29		any medications that Spencer Sinkov was taking?
i	:06:07		either nationally or New York State, which	0203:41		A. Not that I recall.
!	:06:07 SR:51		required nursing staff to take vital signs within	\$2000 to 2		Q. Are there any policies or procedures
- 1	2001 2001 -		a certain amount of time of a new inmate coming into the facility?	02:39:#0 £		by AmeriCor which require nursing staff to,
- 1	200:14 . :00:15 .		A. No.	026955	-	themselves, monitor someone who comes in, having
î	26:75)		Q. Were any of AmeriCor's employees	02.0056 2		utilized drugs or alcohol?
1 **.			COMPU-TRAN SHORTHAND REPORTING	021068 2	65	A. I'm sorry. Again?
1	-					COMPU-TRAN SHORTHAND REPORTING
İ		1	98		1	100
 G2.:	 :026	1 2	98 Kevin Duffy		1	100 Kevin Duffy
	 :826	1 2 3	98 Kevin Duffy counselled or disciplined in any way for their	22:10:58 02:50:17	1 2 3	100 Kevin Duffy Q. Let's assume an inmate comes into
) DZA		1 2 3 4	98 Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to	az:so::Z	3	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical
02.0 62:0	1830	3	98 Kevin Duffy counselled or disciplined in any way for their	02:50::Z	3	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse.
02:0 62:0	1830 06:38	3	98 Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall.	02:50:17 02:15:18	3	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right.
02:0 G2:0 U2:0	1830 16:35 16:41	3 4 5 6	68 Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which	02:50:12 02:10:15 02:16:18 02:50:58	3 4 5 6	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures
02.0 62:0 02:0 02:0	1830 06:35 96:41 :n-40	3 4 5 6 7	68 Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Earlith? (Handing)	02:00:12 02:10:15 02:10:18 02:10:19 02:10:19	3 4 5 6 7	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow
02:0 62:0 02:0 02:0	08:35 06:35 06:41 06:40 06:57	3 4 5 6 7	68 Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing)	02:50:52 02:10:15 02:16:18 02:10:19 02:10:19	3 4 5 6 7	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate?
02:0 62:0 02:0 02:0 02:0	08:35 06:35 06:41 06:40 06:57	3 4 5 6 7 8 9	Fevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that	02:00:12 02:10:15 02:10:18 02:10:19 02:10:19	3 4 5 6 7 8	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs
02:0 62:0 02:0 02:0 02:0 02:0	08:35 06:35 06:41 08:40 08:40 06:57	3 4 5 6 7 8 9	Fevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier?	02:50:52 02:10:15 02:10:18 02:10:19 02:10:19 02:10:25	3 4 5 6 7 8 9	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate?
02:0 02:0 02:0 02:0 02:0 02:0	08:35 06:35 06:41 07:40 06:57 7:47 7:49 1	3 4 5 6 7 8 9 10	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No.	02:00:2 02:10:15 02:10:18 02:10:18 02:10:19 02:10:25 02:10:21 02:10:21	3 4 5 6 7 8 9 0	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes.
02:0 02:0 02:0 02:0 02:0 02:0 02:0	08:35 06:35 06:41 06:50 06:57 71:7 07:19 1	3 4 5 6 7 8 9 10 11 2:	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before.	02:00:2 02:10:14 02:10:18 02:10:18 02:10:18 92:10:28 92:10:21 02:10:21	3 4 5 6 7 8 9 0 1	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawar? A. Yes. Q. What are those policies?
02:0 02:0 02:0 02:0 02:0 02:0 02:0	1830 1833 1831 1830 1833 1833 1833 1833	3 4 5 6 7 8 9 0 1 2 3	Fevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention	02:10:12 02:10:15 02:10:16 02:10:16 02:10:16 02:10:21 02:10:21 02:10:24 1 02:10:24	3 4 5 6 7 8 9 0 1 2 3	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes. Q. What are those policies? A. There are policies and procedures
02.0 02.0 02.0 02.0 02.0 02.0 02.0 02.0	1830 1831 1831 1831 1840 1840 1840 1840 1840 1840 1840 184	3 4 5 6 7 8 9 10 11 2 3 4	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B	02:10:12 02:10:18 02:10:18 02:10:18 02:10:18 02:10:25 02:10:21 02:10:24 1 02:10:24 1 02:10:24 1	3 4 5 6 7 8 9 0 1 2 3 4	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating
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02.00 02.00	1830 1835 1831 1831 1830 1830 1830 1830 1830 1830	3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 1	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B refers to the administration of Suicide Prevention Screening Guidelines Form 330 ADM. Do you see that? A. Yes. Q. Did you ever have any discussions with anybody about the suicide screening form that Putnam County used at intake in comparison	02:10:15 02:10:16 02:10:16 02:10:16 02:10:25 02:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:11:25 1	3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawa!? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating signs and symptoms of drug withdrawal. There's a drug and alcohol withdrawa! flow sheet, for example. Q. And that would be if an AmeriCor staff person observed signs and symptoms of an
02:00 02:00	1830 1831 1831 1831 1831 1833 1833 1833	3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 1	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B refers to the administration of Suicide Prevention Screening Guidelines Form 330 ADM. Do you see that? A. Yes. Q. Did you ever have any discussions with anybody about the suicide screening form that Putnam County used at intake in comparison	02:00:2 02:10:18 02:10:18 02:10:18 02:10:18 02:10:18 02:10:25 02:10:25 1 02:10:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 1 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:10 02:1	3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating signs and symptoms of drug withdrawal. There's a drug and alcohol withdrawal flow sheet, for example. Q. And that would be if an AmeriCor staff person observed signs and symptoms of an inmate having withdrawal?
02.02 02 02.02 02 02.02 02 02 02 02 02 02 02 02 02 02 02 02 0	1830 1835 1851 1851 1850 1850 1850 1850 1850 185	3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 1 1 2 3	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B refers to the administration of Suicide Prevention Screening Guidelines Form 330 ADM. Do you see that? A. Yes. Q. Did you ever have any discussions with anybody about the suicide screening form that Putnam County used at intake in comparison to the ADM 330? A. Not that I recall.	02:10:15 02:10:16 02:10:16 02:10:16 02:10:25 02:10:25 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:02:10:26 10:21:10:	3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating signs and symptoms of drug withdrawal. There's a drug and alcohol withdrawa! flow sheet, for example. Q. And that would be if an AmeriCor staff person observed signs and symptoms of an inmate having withdrawal? A. Yes.
02:02 02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02:02 02 02:02 02 02 02 02 02 02 02 02 02 02 02 02 0	1830 1830 1831 1831 1831 1832 1833 1833 1833 1833	3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 1 1 2 3 4	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B refers to the administration of Suicide Prevention Screening Guidelines Form 330 ADM. Do you see that? A. Yes. Q. Did you ever have any discussions with anybody about the suicide screening form that Putnam County used at intake in comparison to the ADM 330? A. Not that I recall. Q. Did anybody ever indicate to you, in	02:10:15 02:10:16 02:10:16 02:10:16 02:10:25 02:10:25 10:2:10:25 10:2:10:25 10:2:10:25 10:2:10:25 11:2:11:25 12	3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3 1	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawal? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating signs and symptoms of drug withdrawal. There's a drug and alcohol withdrawal flow sheet, for example. Q. And that would be if an AmeriCor staff person observed signs and symptoms of an inmate having withdrawal? A. Yes. Q. How about prior to that? In other
02:02 02 02:02 02 02 02 02 02 02 02 02 02 02 02 02 0	1830 1835 1851 1851 1850 1850 1850 1850 1850 185	3 4 5 6 7 8 9 10 11 2 3 4 5 6 7 8 9 0 1 1 2 3 4	Kevin Duffy counselled or disciplined in any way for their conduct or their lack thereof pertaining to Spencer Sinkov or the events of May 20th? A. Not that I recall. Q. Did you ever see Exhibit 2, which are regulations from the Putnam County Correctional Facility? (Handing) A. Is this part of the handbook that you gave me earlier? Q. No. A. I don't recall seeing this before. Q. If I could just point your attention to the second page, the top of the page, letter B refers to the administration of Suicide Prevention Screening Guidelines Form 330 ADM. Do you see that? A. Yes. Q. Did you ever have any discussions with anybody about the suicide screening form that Putnam County used at intake in comparison to the ADM 330? A. Not that I recall. Q. Did anybody ever indicate to you, in	02:10:18 02:10:18 02:10:18 02:10:18 02:10:18 02:10:25 02:10:25 10:210:25 10:210:25 10:210:25 10:210:25 11:22:10:25 11:22:10:25 12:21:25 12	3 4 5 6 7 8 9 0 1 2 3 4 5 6 7 8 9 0 1 2 3 4 1	Kevin Duffy Q. Let's assume an inmate comes into the facility and reports on the medical screening, a history of drug abuse. A. Right. Q. Are there any policies or procedures that AmeriCor's staff are required to follow which provide for them to monitor that inmate? For example, to see if they're showing any signs of withdrawa? A. Yes. Q. What are those policies? A. There are policies and procedures that address when an inmate is demonstrating signs and symptoms of drug withdrawal. There's a drug and alcohol withdrawal flow sheet, for example. Q. And that would be if an AmeriCor staff person observed signs and symptoms of an inmate having withdrawal? A. Yes. Q. How about prior to that? In other words, if an inmate comes into the facility and

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	: 101	1 43-20	103
j	1 Kevīn Du.		1 Kevin Duffy
92:11:22	2 staff required to follow up or monitor that	92:10:57	2 Q. Do you recall?
02:31:25	3 inmate?	02:5356	 A. Specifically, I don't recall when.
) - 1-129	4 A. Depending on what they see	03:14,00 4	4 Q. Other than the Drug and Alcohol Flow
l c	5 physically and what they the level of	02-14:05	5 Sheet, are there any other components to the
02/11/46	6 truthfulness that they assess the inmate at, yes.	02:74:07	6 program?
92:17:51	 Q. What form would that monitoring or 	32;14;67	7 A. Yes.
02:31:56	8 follow up take? Is it a physical viewing of the	62:14:08 8	Q. What are they?
9211:50	9 inmate and a medical evaluation? Something else?	02·1+00 \$	A. The procedures are specific for the
02:12:01 1	The state of the state of the	22:14,1n 10	
02:12:07 11	To could	02:1621 11	
021209 1	The projection of the period off	0214.95 12	Q. In terms of what medications will be
02:12:12 13		52:14;5a 13	administered?
02:12:15 14	· ·	62:16:21 14	A. Well, they're specific to the
02/78/79 15	5 of the nurse?	∫ າ≳ເພາະ 15	
02-12:12 16		921562 16	
02:12:20: 17	and for any tangentest	G2:14:45 17	Q. In terms of, though, the specific
92:12:25 18	process of Process of Man 1400 Acres to alread	i d≥ 14-94 18	
02:17:27 19	The state of the s	22:14:47 19	
na-120n 20	7 7 7	62:14.51 20	
921204 21	1 72 hours?	02:14:52 21	A. Well, that determination is made by
^{∱ сана} и 22	A. I'm sure that's part of the	02:14:58 22	•
02:tzde 23		02:15.02 23	
35 1538 24		0215.05 24	
02;12×1 25	procedures which would require an AmeriCor nurse	02:15:07 - 25	Q. And do AmeriCor nursing staff
l	COMPU-TRAN SHORTHAND REPORTING	<u> </u>	COMPU-TRAN SHORTHAND REPORTING
:	102		104
1	rem bully	1	Kevin Duffy
02:52:44 2	to go back within that period of time, within 24,	c2:25:08 2	contact the physician if they believe that
72:12%9 3		02:15:19 3	they an inmate is in need of some type of
(2125) 4	- The state of the	a2:15:15 4	medication for withdrawal?
02:10:00 5	The state of the s	02:15.58 5	A. Yes.
02:305 6	specific requirements; but if that were the case,	0215de 6	Q. That's something that they're
02:13:12 7	and the confections,	æ:15:18 7	required to do by reason of policy; correct?
02:13:17 8		t2:15:27 8	A. Yes.
π <u>2</u> 7821 9		02.15.22 9	Q. Are you familiar with Methadone at
62:13/2: 10	Q. Take a look, if you would, at	D2:15:26 10	al[?
02:19.25 11	Exhibit 25.	92::526 11	A. Yes.
02:13:29 12	A. Okay,	on:15:27 12	Q. Are there any policies that you're
G2:1325 13	Q. The Bates stamped Page 561, the	az:15;20 13	aware of pertaining to AmeriCor or Putnam County,
02:10:33 14	bottom. "Detoxification" is the section.	02:501 14	which indicate that Methadone will not be used in
ಸಾಬಾ 15 ಕರ	A. Okay.	021540 15	the facility?
52:13:59 16	Q. It refers to a medical detoxification	12.15;41 16	A. I don't believe that there are any
02:10:45 17	program conforming to the national standards.	C2:545 17	specific policies or procedures that say that
021398 18	Do you see that?	0215.50 18	Methadone will not be used.
02:12:45 19	A. Yes.	DZ:15:51 19	Q. Again, under the "Detoxification"
02:13:50 20	Q. Was such a program ever put in	02::555 20	section Bates stamped 561, the next sentence:
02:352 21	place?	02:15:58 21	"Immates will initially be screened during the
· 22	A. Yes.	D2:16:01 22	Receiving Screening process."
1201452 23	Q. When?	\$2:16:03 23	Do you see that?
02:13:50 24 02:13:51 25	A. Probably at the beginning of the	02.16.D1 24	A. Wait a minute. We're on 561?
021541 /5 1			
	COMPLETE AND CONTRACT OF THE C	02:16:08 25	MR. COON: Rìght here.
	COMPU-TRAN SHORTHAND REPORTING	vz:16:04 25	MR. COON: Right here. COMPU-TRAN SHORTHAND REPORTING

ı ——	Case 7:07-cv-02866-CS-GAY Documer	nt 23-20	Filed 05/07/2908 Page 28 of 28
İ	1 Kevin Duff	į	107
02:16.05	2 (Indicating)		1 Kevin Duffy
02:16:10	3 A. Okay. Yes.	1	2 A. Well, if an inmate reports having
r ₁₉	4 Q. And is that screening done by a		3 symptoms, or if an officer reports seeing
. 2	5 nurse?]	4 symptoms; or in the case of a nurse having 5 contact with the inmate for any season if he or
02:75:13	6 A. It's part of the Receiving Screening	'	contact with the inmate for any reason, if he orshe saw the symptoms.
02:16:17	7 done by the correctional officer.		7 Q. But the nurse isn't required to go
C2:16:18	8 Q. So, it's just what's contained on	1	8 back, fet's say, and periodically check on an
02:15:21	9 the form?	02:18:14	
62:16:22 1	0 A. Yes.	021616 10	
02:35:23 1	 Q. Then, it says, "An additional 	02:18:1a 1 1	
02:16:25 1	2 evaluation for their use of, or dependence on.	CZ::18.23 12	
{ G2:16:28 1 3	3 drugs and/or alcohol will be performed when the	 0≥1826 13	_
02:335 14	4 physical exam is completed."	92:18:32 14	_
D2:10:30 1 \$	- 11 1441	92:16.35 15	-
02::828 10	and the color bullances exam that a	±=1±:33 1€	
02.16:35 17		camesto #7	
02:16.38 18 	The ball 14-day matory and	geneso 18	Q. Do you know if inmates are, as a
02:541 19		02:1834 19	matter of routine, advised of their rights to
DZ1G41 20	A. And curre second descriptions 14 08\$2	52::8:49 20	seek any kind of medical treatment?
62:16:45 21		021848 21	The state of the one of
92:18:45 22 92:18:46 23		52:18:51 22	
02:25:45 24	The title open dilect	cz:8.62 23	The davided profits
02:16:00 25	A P 1/412C GIIG 1-645646G BA	1021853 24	Mental the officer of the fiftise Mun
023430 20	COMPU-TRAN SHORTHAND REPORTING	92:18:57 25	
l		 	COMPU-TRAN SHORTHAND REPORTING
j 1	106 Kevin Duffy		108
02:16:50 2	Q. It says, "Nurses will record vital	0215,57 2	Kevin Duffy Q. Do you know for sure?
GZ::15:56 3	signs, record any symptoms or signs of	02:18:58	Q. Do you know for sure? A. Do I know for sure which one?
02:17:00 4	dependence; and as needed, contact the physician	62:19:00 4	Q. Yes.
sq:17:00 5	for individual orders." Correct?	0215:D) 5	A. No.
02:27:05 6	A. Yes.	m2:19:01 6	Q. The bottom of Page 561: "Individuals
02:17:96 7	Q. When you say in this document,	c21907 7	at risk for progression to more severe levels of
92:17.28	"Nurses will record vital signs," when is that	a2:19:11 &	withdrawal, will be under constant observation by
021713 🕏	recording supposed to be done?	92:39:14 9	correctional officers."
27:17:14 10	 During the physical exam. 	02:12:15 1O	Do you see that?
C2:37 5 11	Q. So, that's the one within 14 days?	44319:16 11	A. Yes.
0217:18 12	A. Yes.	20:1215 12	Q. Was that actually ever a policy that
22:17:18 13	Q. And in terms of symptoms or signs of	021220 13	was implemented for AmeriCor nursing staff?
02:57:21 14	dependence, that would be within the 14 at the	02:1927 14	MR. COON: Objection to form,
021724 75	time of the 14-day history and physical?	22:1928 15	but you can answer it.
DE1728 16	A. That would be part of the history	02:19:34 16	A. It's addressed in the policies and
cz::702 17	and physical, yes.	02:19:27 17	procedures that we discussed earlier about
maina 18	Q. Well, at any other point in time,	:≥:≥∞ 18	withdrawal, and the flow sheet, and so forth.
\$2:17:25 19 \$2:17:52 20	would they be recording any symptoms or signs of	0219:13 19	Q. And do you believe that the policies
02:07:42 20 02:07:42 21	dependence?	02:19:45 20	and procedures provide for constant supervision?
1 22	A. Well, if an inmate were	421345 21	A. By the correctional staff?
1 ZZ 02:1197 23	demonstrating signs of withdrawal prior to that,	0215:31 .22	Q. Yes.
02:17#2 24	it would appear in the record. Q. How would a nurse know that, if they	ФСТИНИИ 23	A. Yes.
	11 11 11 11 11 11 11 11 11 11 11 11 11	20,55 24	Q. Are you aware of any policies or
02:17:69 25	don't do the every within your the first on the control !	**	
02:17:52 25	don't do the exam within, say, the first 72 hours? COMPU-TRAN SHORTHAND REPORTING	d2:10.58 25	procedures the correctional staff is required to COMPU-TRAN SHORTHAND REPORTING